

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

FILED
SCRANTON

MAY 14 2007

DEPUTY CLERK

AM-3086
(Inmate Number)

HENRY UNSELD WASHINGTON
(Name of Plaintiff)

1100 PIKE ST., HUNTINGDON, PA. 16657-1113
(Address of Plaintiff)

4:

07-00867
(Case Number)

COMPLAINT

vs.

JAMES L. GARCE; DAVID J. WAKEFIELD; DORINA VARNER;

MELVIN S. LOCKETT; R. M. LAWLER; HARRY WILSON; LINDA

HARRIS; MARK KRYSEVIC; CAROL SCIRE; S. CLUNT
(Names of Defendants)

TO BE FILED UNDER: ☒ 42 U.S.C. § 1983 - STATE OFFICIALS

☐ 28 U.S.C. § 1331 - FEDERAL OFFICIALS

I. Previous Lawsuits

- A. If you have filed any other lawsuits in federal court while a prisoner please list the caption and case number including year, as well as the name of the judicial officer to whom it was assigned:

WASHINGTON V. KLEM, NO. 01-CV2432, 2001; HONORABLE: JOHN
E. JONES

II. Exhaustion of Administrative Remedies

- A. Is there a grievance procedure available at your institution?

☒ Yes ☐ No

- B. Have you filed a grievance concerning the facts relating to this complaint?

☒ Yes ☐ No

If your answer is no, explain why not THERE IS DEFINITELY GOING TO BE A VICIOUS RETALIATIONS
AND PUNITIVE ACTIONS TAKEN AGAINST ME FOR MY HAVING FILED THIS 42 U.S.C. 1983 COMPLAINT

- C. Is the grievance process completed? ☒ Yes ☐ No

III. Defendants

(In Item A below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Use Item B for the names, positions and places of employment of any additional defendants.)

- A. Defendant JAMES L. GRACE - DAVID J. WAKEFIELD - DORINA VARNER - R.M. LAWLER is employed as WARDEN - WARDEN'S ASSISTANT - DEPUTY WARD at SCI - HUNTINGDON, & SCI - FAYETTE
- B. Additional defendants S. GLUNT - MELVIN S. LOCKETT - HARRY E. WILSON - LINDA D. HARATS - MARK A. KRYSEVEC - CAROL SCITRE - BARTLEY - RHODES - DOBRYZINSKI - PEATRICK - KOVAL - RITCHER/RI - CHEY - JOHN S. SCHAFER - WILLIAM S. STICKMAN - MICHAEL A. FARNAN - ALAN B. FOGEL - CAP FESHER - CAPT MANCHAS - CAPT KAUFFMAN - CAPT. SCOTT NICKELSON - LT. J. EWING - LT. T. HOLTZ - LT. R. COOPER - SSG. JONSON - MIRABELLA - LILLA - B. BULTER - B. SMITH - HOSLER - MCLAEN

IV. Statement of Claim

(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach extra sheets if necessary.)

1. DEFENDANT: JAMES L. GRACE; AT ALL TIMES ^{RELEVANT} ~~RELEVANT~~ TO THIS ACTION IS THE WARDEN OF THE STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY - MEDICAL CARE - CUSTODY - CONTROL OF INMATES. 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2005 - TIL TO DATE! FAILED TO UPHOLD HIS DUTIES AND INDIVIDUAL CAPACITY IS BEING SUED
2. DEFENDANT: DAVID J. WAKEFIELD; AT ALL TIMES ^{RELEVANT} ~~RELEVANT~~ TO THIS ACTION IS THE WARDEN OF THE STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY - MEDICAL CARE - CUSTODY - N - CONTROL OF INMATES. 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2005 - TIL TO DATE! FAILED TO UPHOLD HIS DUTIES. IS BEING SUED IN HIS INDIVIDUAL AND OFFICIAL CAPACITY
3. DEFENDANT: DORINA VARNER, AT ALL TIMES ^{RELEVANT} ~~RELEVANT~~ TO THIS ACTION IS THE WARDEN'S ASSISTANT OF THE STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. SHE IS LEGALLY RESPONSIBLE FOR THE SAFETY - MEDICAL CARE - CUSTODY - N - CONTROL OF INMATES. 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2005 - TIL TO DATE! FAILED TO UPHOLD HER DUTIES IS BEING SUED IN HER OFFICIAL AND INDIVIDUAL CAPACITY

5. ACTION IS SUPERINTENDENT OF THE STATE CORRECTIONAL INSTITUTION. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY - MEDICAL CARE - CUSTODY - AND CONTROL OF THE INMATES, BOX 9999, LABELLE, PA. 15450-0999; FROM 2005 TIL TO DATE! FAILURE TO UPHOLD HIS DUTIES IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

6. DEFENDANT: CAROL SCIRE, AT ALL TIMES RELEVANT TO THIS ACTION IS THE SUPERINTENDENT'S ASSISTANT OF STATE CORRECTIONAL INSTITUTION, FAYETTE, DEPARTMENT OF CORRECTIONS. SHE IS LEGALLY RESPONSIBLE FOR THE SAFETY - MEDICAL CARE - CUSTODY - AND CONTROL OF INMATES, BOX 9999, LABELLE, PA. 15450; FROM 2005 TIL TO DATE! FAILURE TO UPHOLD HER DUTIES, BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

7. DEFENDANT: R. M. LAWLER, AT ALL TIMES RELEVANT TO THIS HE IS LEGALLY RESPONSIBLE FOR THE SAFETY - MEDICAL CARE - CUSTODY - AND CONTROL OF INMATES, OF STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. THE DEPUTY WARDEN, 1100 PIKE ST, HUNTINGDON, PA. 16654-1112; FROM 2005 TIL TO DATE! FAILURE TO UPHOLD HIS DUTIES IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

8. DEFENDANT: MELVIN S. LOCKETT, AT ALL TIMES RELEVANT TO THIS ACTION IS THE DEPUTY WARDEN OF STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS RESPONSIBLE FOR THE SAFETY - MEDICAL CARE - CUSTODY - AND CONTROL OF INMATES, 1100 PIKE ST, HUNTINGDON, PA. 16654-1112; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

9. DEFENDANT: LINDA D. HARRIS, AT ALL TIMES RELEVANT TO THIS ACTION IS DEPUTY WARDEN OF STATE CORRECTIONAL INSTITUTION FAYETTE, DEPARTMENT OF CORRECTIONS. SHE IS RESPONSIBLE FOR THE SAFETY - MEDICAL CARE - CUSTODY - AND CONTROL OF INMATES, BOX 9999, LABELLE, PA. 15450-0999; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HER DUTIES IS BEING SUED IN HER OFFICIAL AND INDIVIDUAL CAPACITY.

10. DEFENDANT: MARK A. KRYSEVIC, AT ALL TIMES RELEVANT TO THIS ACTION IS DEPUTY WARDEN OF STATE CORRECTIONAL INSTITUTION FAYETTE, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY - MEDICAL CARE - CUSTODY - AND CONTROL OF INMATES, BOX 9999, LABELLE, PA. 15450-0999; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

11. DEFENDANT: S. GLINT, AT ALL TIMES RELEVANT TO THIS ACTION IS THE MAJOR OF UNIT MANAGEMENT OF THE STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR UNIT MANAGEMENT, TEAMS ASSIGNMENT TO EACH HOUSING UNIT - SUPERVISES ALL CORRECTIONS OFFICERS - DAILY SECURITY OF THE INSTITUTION, AND THE SAFETY - MEDICAL CARE - CUSTODY - AND CONTROL OF INMATES, 1100 PIKE ST, HUNTINGDON, PA. 16654-1112; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

12. DEFENDANT: FISHER, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CAPTAIN OF SECURITY DEPARTMENT OF THE STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE DAILY SECURITY OF THE INSTITUTION - AND THE SAFETY OF ALL STAFF AND INMATES, AND THE MEDICAL CARE - CUSTODY - AND CONTROL OF INMATES, 1100 PIKE ST, HUNTINGDON, PA. 16654-1112; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

13. DEFENDANT: KAUFFMAN, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CAPTAIN OF THE DEPARTMENT OF SECURITY OF STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE DAILY SECURITY OF THE INSTITUTION AND STAFF MEMBERS, AND THE SAFETY - MEDICAL CARE - CUSTODY - AND CONTROL OF INMATES, 1100 PIKE ST, HUNTINGDON, PA. 16654-1112; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

14. DEFENDANT: F. MANCHAS, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CAPTAIN OF SECURITY OF STATE CORRECTIONAL INSTITUTION, FAYETTE, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE DAILY SECURITY OF THE INSTITUTION AND STAFF, AND SAFETY - MEDICAL CARE - CUSTODY - AND CONTROL OF INMATES, BOX 9999, LABELLE, PA. 15450-0999; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

14. DEFENDANT: SCOT CASE 4073-09867-JFJ Document 1 Filed 05/14/07 Page 4 of 44
INSTITUTION, FAYETTE, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE DAILY SECURITY OF THE INSTITUTION, AND SAFETY - CUSTODY - CARE, AND CONTROL OF THE INMATES. BOX 9999, LaBELLE, PA. 15456-0999; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES, IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY
15. DEFENDANT: R. COOPER, AT ALL TIMES RELEVANT TO THIS ACTION IS THE LIEUTENANT OF STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE DAILY SECURITY OF THE INSTITUTION, AND SAFETY - MEDICAL CARE - CUSTODY - N - CONTROL OF THE INMATES. 1100 PIKE ST, HUNTINGDON, PA. 16834-1112; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES, IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY
16. DEFENDANT LT. T. HOLTZ, AT ALL TIMES RELEVANT TO THIS ACTION IS THE LIEUTENANT OF THE STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS HE IS LEGALLY RESPONSIBLE FOR THE DAILY SECURITY OF THE INSTITUTION, AND SAFETY - MEDICAL CARE - CUSTODY - N - CONTROL OF THE INMATES. 1100 PIKE ST, HUNTINGDON, PA. 16834-1112; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES, IS BEING SUED IN HIS OFFICIAL CAPACITY AND INDIVIDUAL CAPACITY
17. DEFENDANT: J. EDDING, AT ALL TIMES RELEVANT TO THIS ACTION IS THE LIEUTENANT OF THE STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS HE IS LEGALLY RESPONSIBLE FOR THE DAILY SECURITY OF THE INSTITUTION, AND SAFETY - MEDICAL CARE - CUSTODY - N - CONTROL OF THE INMATES. 1100 PIKE ST, HUNTINGDON, PA. 16834-1112, FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES, IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY
18. DEFENDANT: LT. HARMAN, AT ALL TIMES ~~RELEVANT~~ RELEVANT TO THIS ACTION IS THE LIEUTENANT OF THE STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS HE IS LEGALLY RESPONSIBLE FOR THE DAILY SECURITY OF THE INSTITUTION, AND SAFETY - MEDICAL CARE - CUSTODY - N - CONTROL OF THE INMATES. 1100 PIKE ST, HUNTINGDON, PA. 16834-1112; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES, IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY
19. DEFENDANT: JOHNSON, AT ALL TIMES RELEVANT TO THIS ACTION IS THE LIEUTENANT OF THE STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE DAILY SECURITY OF THE INSTITUTION, AND SAFETY - MEDICAL CARE - CUSTODY - N - CONTROL OF THE INMATES. 1100 PIKE ST, HUNTINGDON, PA. 16834-1112; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES, IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY

G. WALTER

20. DEFENDANT: ~~WALTER~~, AT ALL TIMES RELEVANT TO THIS ACTION IS THE LIEUTENANT OF THE STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE DAILY SECURITY OF THE INSTITUTION AND SAFETY - MEDICAL CARE - CUSTODY - N - CONTROL OF INMATES. 1100 PIKE ST, HUNTINGDON, PA. 16834-1112; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES, IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY

21. DEFENDANT: BAIRD, AT ALL TIMES RELEVANT TO THIS ACTION IS THE LIEUTENANT OF THE STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE DAILY SECURITY OF THE INSTITUTION, AND SAFETY-MEDICAL CARE-CUSTODY-AND CONTROL OF INMATES. 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES, IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

22. DEFENDANT: MAZINCA, AT ALL TIMES RELEVANT TO THIS ACTION IS THE LIEUTENANT OF THE STATE CORRECTIONAL INSTITUTION FAYETTE, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE DAILY SECURITY OF THE INSTITUTION, AND SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF THE INMATES. BOX 9999, LA BELLE, PA. 15450-0999; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES, IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

23. DEFENDANT: CRUMB, AT ALL TIMES RELEVANT TO THIS ACTION IS THE LIEUTENANT OF STATE CORRECTIONAL INSTITUTION FAYETTE, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE DAILY SECURITY OF THE INSTITUTION, AND SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF INMATES. BOX 9999; LA BELLE, PA. 15450-0999; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES, IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

24. DEFENDANT: GEORGE REPOSKY, AT ALL TIMES RELEVANT TO THIS ACTION IS THE LIEUTENANT OF STATE CORRECTIONAL INSTITUTION FAYETTE, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE DAILY SECURITY OF THE INSTITUTION, AND SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF INMATES. BOX 9999, LA BELLE, PA. 15450-0999; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES, IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

25. DEFENDANT: JON TUSTIN, AT ALL TIMES RELEVANT TO THIS ACTION IS THE LIEUTENANT OF STATE CORRECTIONAL INSTITUTION FAYETTE, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE DAILY SECURITY OF THE INSTITUTION, AND SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF INMATES. BOX 9999, LA BELLE, PA. 15450-0999; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES, IS BEING SUED IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY.

26. DEFENDANT: MARY LOU SHAWALTER, AT ALL TIMES RELEVANT TO THIS ACTION IS THE ^{HEALTH CARE ADMINISTRATOR} [REDACTED] OF STATE CORRECTIONAL INSTITUTION, HUNTINGDON, DEPARTMENT OF CORRECTIONS. SHE IS LEGALLY RESPONSIBLE FOR THE MEDICAL CARE AND TREATMENT OF INMATES. 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL TO DATE! FAILED TO UPHOLD HER DUTIES, IS BEING SUED IN HER OFFICIAL AND INDIVIDUAL CAPACITY.

27. DEFENDANT: ROBERT TRETINIK, AT ALL TIMES RELEVANT TO THIS ACT IS THE HEALTH CARE ADMINISTRATOR OF STATE CORRECTIONAL INSTITUTION FAYETTE, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE MEDICAL CARE AND TREATMENT OF INMATES. BOX 9999, LA BELLE, PA. 15450; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES, IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

28. DEFENDANT: MS. MELLIS, AT ALL TIMES RELEVANT TO THIS ACTION IS THE PAC (PHYSICIAN'S ASSISTANT) OF STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. SHE IS LEGALLY RESPONSIBLE FOR THE MEDICAL CARE AND TREATMENT OF INMATES. 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL TO DATE! FAILED TO UPHOLD HER DUTIES, IS BEING SUED IN HER OFFICIAL AND INDIVIDUAL CAPACITY.

CORRECTIONAL INSTITUTION FAYETTE, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE MEDICAL
CARE -N- TREATMENT OF INMATES. BOX 9999, LABELLE, PA. [REDACTED] - [REDACTED] 15450-0999; FROM 2005 TIL

TO DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY

30. DEFENDANT: DR. ROMED, AT ALL TIMES RELEVANT TO THIS ACTION IS THE DOCTOR OF STATE CORRECTIONAL IN
STITUTION HUNTINGDON, DEPARTMENT OF [REDACTED] CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE MEDICAL [REDACTED]

[REDACTED] CARE AND TREATMENT OF INMATES. 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL TO DATE! FAILED

UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY

31. DEFENDANT: ARANEDA, AT ALL TIMES RELEVANT TO THIS ACTION IS THE MEDICAL DOCTOR AT STATE CORRECTIO
AL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE MEDICAL

CARE AND TREATMENT OF INMATES 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL TO DATE!

HAS FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

32. DEFENDANT: SOLIDON, AT ALL TIMES RELEVANT TO THIS ACTION IS THE DOCTOR AT STATE CORRECTIONAL INST

TUTION HUNTINGDON, DEPARTMENT OF CORRECTION. HE IS LEGALLY RESPONSIBLE FOR THE MEDICAL CARE AND ^{TREA}
MENT OF INMATES. 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL TO DATE! FAILED TO UPHOLD HIS DV

TES; IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY

33. DEFENDANT: KLEMICK, AT ALL TIMES RELEVANT IS THE MEDICAL DOCTOR AT STATE CORRECTIONAL IN

STITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE MEDICAL CARE

AND TREATMENT OF INMATES. 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL TO DATE! FAILED TO

UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

34. DEFENDANT: ROBERT ATLMAN, AT ALL TIMES RELEVANT TO THIS ACTION IS PSYCHIATRIST AT THE STATE CORRECTIO

AL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR MEDICAL CARE AND

TREATMENT OF INMATES WITH MENTAL -N- PSYCHOLOGICAL PROBLEMS. 1100 PIKE ST., HUNTINGDON, PA. 16654-1112

FROM 2006 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL ^{CAPACITY}

35. DEFENDANT: M. HERBIK, AT ALL TIMES RELEVANT TO THIS ACTION IS THE MEDICAL DOCTOR AT STATE CORRECT

IONAL INSTITUTION FAYETTE, DEPARTMENT OF CORRECTIONS. HE IS RESPONSIBLE FOR THE MEDICAL CARE AND

TREATMENT OF INMATES. BOX 9999, LABELLE, PA. 15450-0999; FROM 2005 TIL TO DATE! FAILE

TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

36. DEFENDANT: BARBARA J. HOLLI BAUGH, AT ALL TIMES RELEVANT TO THIS ACTION IS THE UNIT MANAGER AT STAT

CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. SHE IS RESPONSIBLE FOR THE MANAGEMENT

TEAM OF EACH UNIT - OPEN COMMUNICATION AND MEANINGFUL INTERACTION BETWEEN INMATES AND STAFF, AND SAFE

TY - MEDICAL CARE - CUSTODY -N- CONTROL OF INMATES. 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL

TO DATE! FAILED TO UPHOLD HER DUTIES; IS BEING SUED IN HER OFFICIAL AND INDIVIDUAL CAPACITY

37. DEFENDANT: SCOTT WALTERS, AT ALL TIMES RELEVANT TO THIS ACTION IS UNIT MANAGER AT STATE CORRECTIONAL

INSTITUTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS RESPONSIBLE FOR THE

SUPERVISION OF THE MANAGEMENT TEAM OF HIS ASSIGNED UNIT - OPEN COMMUNICATION, AND MEANINGFUL

INTERACTION BETWEEN INMATES AND STAFF, AND SAFETY - MEDICAL CARE - CUSTODY -N- CONTROL OF INMATES. 1100 PIKE ST.
HUNTINGDON, PA. 16654-1112; FROM 2006 TIL TO DATE! FAILED TO UPHOLD HER DUTIES; IS BEING SUED IN HIS OFFICIAL
IV PAGE TWO PAGE 30

38. CHARLES POWERS, DEFENDANT, AT ALL TIMES RELEVANT TO THIS ACTION IS UNIT MANAGER OF THE STATE CORRECTIONAL INSTITUTION FAYETTE, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE MANAGEMENT TEAM OF HIS ASSIGNED UNIT - OPEN COMMUNICATION, AND MEANINGFUL INTERACTION BETWEEN INMATES AND STAFF, AND SAFETY - MEDICAL CARE - CUSTODY - N-CONTROL OF INMATES. BOX 9999, La BELLE, PA. 15450 - 0999; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

39. DEFENDANT: MICHAEL ZAKEN, AT ALL TIMES RELEVANT TO THIS ACTION IS THE UNIT MANAGER OF THE STATE CORRECTIONAL INSTITUTION FAYETTE, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE MANAGEMENT TEAM OF HIS ASSIGNED UNIT - OPEN COMMUNICATION - N- MEANINGFUL INTERACTION BETWEEN INMATES - N- STAFF, AND SAFETY - MEDICAL CARE - CUSTODY - N- CONTROL OF INMATES. BOX 9999, La BELLE, PA. 15450 - 0999; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

40. DEFENDANT: AMY R. GINTER, AT ALL TIMES RELEVANT TO THIS ACTION IS THE COUNSELOR OF THE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. SHE IS LEGALLY RESPONSIBLE FOR OPEN COMMUNICATIONS - MEANINGFUL INTERACTION BETWEEN INMATES - N- STAFF, AND SAFETY - MEDICAL CARE - CUSTODY - N- CONTROL OF INMATES. 1100 PIKE ST., HUNTINGDON, PA. 16654 - 1112; FROM 2006 TIL TO DATE! FAILED TO UPHOLD HER DUTIES; IS BEING SUED IN HER OFFICIAL AND INDIVIDUAL CAPACITY.

41. DEFENDANT: P. GRESSINGER, AT ALL TIMES RELEVANT TO THIS ACTION IS THE COUNSELOR OF STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. SHE IS LEGALLY RESPONSIBLE FOR THE OPEN COMMUNICATIONS - MEANINGFUL INTERACTION BETWEEN INMATES - N- STAFF, AND SAFETY - MEDICAL CARE - CUSTODY - N- CONTROL OF INMATES. 1100 PIKE ST., HUNTINGDON, PA. 16654 - 1112; FROM 2006 TIL TO DATE! FAILED TO UPHOLD HER DUTIES; IS BEING SUED IN HER OFFICIAL AND INDIVIDUAL CAPACITY.

42. DEFENDANT: GARY ABRAMS, AT ALL TIMES RELEVANT TO THIS ACTION IS THE COUNSELOR AT STATE CORRECTIONAL INSTITUTION FAYETTE, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR OPEN COMMUNICATIONS - MEANINGFUL INTERACTION BETWEEN INMATES - N- STAFF, AND SAFETY - MEDICAL CARE - CUSTODY - N- CONTROL OF INMATES. BOX 9999, La BELLE, PA. 15450 - 0999; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

43. DEFENDANT: CHRISTINA SORBIN, AT ALL TIMES RELEVANT TO THIS ACTION IS THE COUNSELOR AT STATE CORRECTIONAL INSTITUTION FAYETTE, DEPARTMENT OF CORRECTIONS. SHE IS LEGALLY RESPONSIBLE FOR OPEN COMMUNICATIONS - MEANINGFUL INTERACTION BETWEEN INMATES - N- STAFF, AND SAFETY - MEDICAL CARE - CUSTODY - N- CONTROL OF INMATES. BOX 9999, La BELLE, PA. 15450 - 0999; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HER DUTIES; IS BEING SUED IN HER OFFICIAL - N- INDIVIDUAL CAPACITY.

44. DEFENDANT: ROY BARNES, AT ALL TIMES RELEVANT TO THIS ACTION IS THE COUNSELOR AT STATE CORRECTIONAL INSTITUTION FAYETTE, DEPARTMENT OF CORRECTIONS. HE IS RESPONSIBLE FOR OPEN COMMUNICATIONS - MEANINGFUL INTERACTION BETWEEN - N- STAFF, AND MEDICAL CARE - CUSTODY - N- CONTROL OF INMATES. BOX 9999, La BELLE, PA. 15450 - 0999; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

45. DEFENDANT: JOHNSON, AT ALL TIMES RELEVANT TO THIS ACTION IS THE RAIL SERGEANT AT STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR SAFETY - MEDICAL CARE - CUSTODY

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- N-CONTROL OF INMATES. 1100 PIKE STREET, HUNTINGDON, PA. 16654-1112; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY.
44. DEFENDANT: MIRA BELLA, AT ALL TIMES RELEVANT TO THIS ACTION IS THE RAO SERGEANT OF STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF INMATES. 1100 PIKE STREET, HUNTINGDON, PA. 16654-1112; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY.
47. DEFENDANT: LILLA, AT ALL TIMES RELEVANT TO THIS ACTION IS THE RAO SERGEANT AT STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE CUSTODY-SAFETY-MEDICAL CARE-N-CONTROL OF INMATES. 1100 PIKE STREET, HUNTINGDON, PA. 16654-1112; FROM 2005 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY.
48. DEFENDANT: YOUNKER, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER OF THE STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF INMATES. 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY.
49. DEFENDANT: MCKNIGHT, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER AT STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS RESPONSIBLE FOR THE SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF INMATES. 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY.
50. DEFENDANT: S. GRASSMYER, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER AT STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF INMATES. 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY.
51. DEFENDANT: R. PROKOP, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER AT STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF INMATES. 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY.
52. DEFENDANT: RHODES, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER AT STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF INMATES. 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN OFFICIAL AND INDIVIDUAL CAPACITY.
53. DEFENDANT: MR. MILLS, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER AT STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF INMATES. 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY, 6-2 OFFICER MR. MILLS.
54. DEFENDANT: MR. MILLS, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER ON THE 2ND SHIFT AT STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF INMATES. 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

56. DEFENDANT: BARTLEY, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER AT STATE CORRECTIONAL INSTITUTE HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE - CUSTODY - N-CONTROL OF INMATES, 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY.

57. DEFENDANT: TADDEI, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER AT STATE CORRECTIONAL INSTITUTE HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE - CUSTODY - N-CONTROL OF INMATES, 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY.

58. DEFENDANT: LEHMAN, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER AT STATE CORRECTIONAL INSTITUTE HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE - CUSTODY - N-CONTROL OF INMATES, 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY.

59. DEFENDANT: YEDOLSKI, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER AT STATE CORRECTIONAL INSTITUTE HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE - CUSTODY - N-CONTROL OF INMATES, 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY.

60. DEFENDANT: YOST, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER AT STATE CORRECTIONAL INSTITUTE HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE - CUSTODY - N-CONTROL OF INMATES, 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY.

61. DEFENDANT: D. DECKER, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER AT STATE CORRECTIONAL INSTITUTE HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE - CUSTODY - N-CONTROL OF INMATES, 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL AND IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY.

62. DEFENDANT: G. C. BERGER, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER AT STATE CORRECTIONAL INSTITUTE HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE - CUSTODY - N-CONTROL OF INMATES, 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL AND IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY.

63. DEFENDANT: EVERHART, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER AT STATE CORRECTIONAL INSTITUTE HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE - CUSTODY - N-CONTROL OF INMATES, 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL AND IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY.

64. DEFENDANT: HALL, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER AT STATE CORRECTIONAL INSTITUTE HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE - CUSTODY - N-CONTROL OF INMATES, 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL AND IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY.

AL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS RESPONSIBLE FOR THE SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF INMATES, 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

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65. DEFENDANT: MR. SINGALTER, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER AT STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS RESPONSIBLE FOR THE SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF INMATES, 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2004 TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

66. DEFENDANT: DONALDSON, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER AT STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF INMATES, 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

67. DEFENDANT: R. A. STEVER, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER AT THE STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF INMATES, 1100 PIKE ST., HUNTINGDON, PA. 16654-1112; FROM 2006 TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

68. DEFENDANT: SERGEANT: SHORP, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER AT THE STATE CORRECTIONAL INSTITUTION ~~FAVETTE~~. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF INMATES, BOX 9999, LABELLE, PA. 15450-0999; FROM 2005 - TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

69. DEFENDANT: DOBRYZINSKI, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER AT THE STATE CORRECTIONAL INSTITUTION FAYETTE, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF INMATES, BOX 9999, LABELLE, PA. 15450-0999; FROM 2005 - TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY.

70. DEFENDANT: PEATRACK, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER AT THE STATE CORRECTIONAL INSTITUTION FAYETTE, DEPARTMENT OF CORRECTIONS. HE IS RESPONSIBLE FOR THE SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF INMATES, BOX 9999, LABELLE, PA. 15450-0999; FROM 2005 TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY.

71. DEFENDANT: KOVAL, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER AT THE STATE CORRECTIONAL INSTITUTION FAYETTE, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF INMATES, BOX 9999, LABELLE, PA. 15450-0999; FROM 2005 TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

72. DEFENDANT: RITCHER/RICHEY, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER AT THE STATE CORRECTIONAL INSTITUTION FAYETTE, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF INMATES, BOX 9999, LABELLE, PA. 15450-0999; FROM 2005 TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY.

73. DEFENDANT: MARK POWELL, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER AT THE STATE CORRECTIONAL INSTITUTION FAYETTE, DEPARTMENT OF CORRECTIONS. HE IS RESPONSIBLE FOR THE SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF INMATES, BOX 9999, LABELLE, PA. 15450-0999; FROM 2005 TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES;

74. DEFENDANT: HAYDEN, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONAL OFFICER AT THE STATE CORRECTIONAL INSTITUTION FAYETTE, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF INMATES, BOX 9999, LABELLE, PA. 15450-0999; FROM 2005 TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY.

75. DEFENDANT: D. EVANS, AT ALL TIMES RELEVANT TO THIS ACTION IS THE OFFICER OF CORRECTIONS OF THE STATE CORRECTIONAL INSTITUTION FAYETTE, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF INMATES, BOX 9999, LABELLE, PA. 15450-0999; FROM 2005 TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY.

76. DEFENDANT: SNYDER, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER AT STATE CORRECTIONAL INSTITUTION FAYETTE, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF INMATES, BOX 9999, LABELLE, PA. 15450-0999; FROM 2005 TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY.

77. DEFENDANT: CRITCHMAN, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER OF THE STATE CORRECTIONAL INSTITUTION FAYETTE, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF INMATES, BOX 9999, LABELLE, PA. 15450-0999; FROM 2005 TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY.

78. DEFENDANT: SHARON M. BURKS, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CHIEF GRIEVANCE OFFICER/COORDINATOR AT THE PENNSYLVANIA DEPARTMENT OF CORRECTIONS. SHE IS LEGALLY RESPONSIBLE FOR THE GRIEVANCE BEING HEARD AND RESOLVED OF ALL INMATES GRIEVANCES. DEPARTMENT OF CORRECTIONS, 2520 LISBURN ROAD, P.O. BOX 598, CAMP HILL, PA. 17001-0598. SHE IS BEING SUED IN HER OFFICIAL-N-INDIVIDUAL CAPACITY. FAILED TO UPHOLD HER DUTIES; FROM 2005 TIL-TO-DATE!

79. DEFENDANT: JEFFREY A. BEARD, AT ALL TIMES RELEVANT TO THIS ACTION IS THE SECRETARY/COMMISSIONER OF THE PENNSYLVANIA DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF ALL INMATES IN EVERY PA. STATE CORRECTIONAL INSTITUTION LOCATED WITHIN THE STATE OF PA. 2520 LISBURN ROAD, P.O. BOX 598; FROM 2005 TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; IS BEING SUED IN HIS OFFICIAL-N-INDIVIDUAL CAPACITY.

80. DEFENDANT: JOHN S. SCHAFER, AT ALL TIMES RELEVANT TO THIS ACTION IS THE EXECUTIVE SUPERVISOR OF THE PA. DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY-MEDICAL CARE-CUSTODY-N-CONTROL OF ALL INMATES IN EVERY PRISON/PA. STATE PRISON LOCATED IN PA. 2520 LISBURN ROAD, P.O. BOX 598; FROM 2005 TIL-TO-DATE!

81. DEFENDANT: WILLIAM S. STICKMAN; AT ALL TIMES RELEVANT TO THIS ACTION IS THE DEPUTY COMMISSIONER OF THE PA. DOC, AT THE PENNSYLVANIA DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY - MEDICAL CARE - CUSTODY - N-CONTROL OF ^{ALL} OF THE INMATES IN HIS ASSIGNED REGION. FAYETTE, AND HUNTINGDON ARE BOTH IN HIS ASSIGNED REGION. 2520 LISBURN ROAD, ^{P.O.} BOX 598, CAMP HILL, PA. 17001-0598; FROM 2005 TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; HE IS BEING SUED IN HIS OFFICIAL - N-INDIVIDUAL CAPACITY.
82. DEFENDANT: MICHAEL A. FARNAN, AT ALL TIMES RELEVANT TO THIS ACTION IS THE ^{CHIEF} ~~DEPUTY~~ COUNSEL FOR THE DEPARTMENT OF CORRECTIONS' GOVERNOR'S OFFICE OF GENERAL COUNSEL AT THE PA. DOC. HE IS RESPONSIBLE FOR REPRESENTING THE DOC IN THEIR DISPUTES WITH INMATE, AND SAFETY - MEDICAL CARE - CUSTODY - N-CONTROL OF INMATES. 2520 LISBURN ROAD, P.O. BOX 598, CAMP HILL, PA. 17001-0598; FROM 2005 TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; HE IS BEING SUED IN HIS OFFICIAL - N-INDIVIDUAL CAPACITY.
83. DEFENDANT: ALAN B. FOGEL, AT ALL TIMES RELEVANT TO THIS ACTION IS THE DIRECTOR OF BUREAU OF HEALTH CARE AND FOOD SERVICES FOR THE PA. DEPARTMENT OF CORRECTIONS. AND, ALSO RESPONSIBLE FOR THE MEDICAL CARE - N-TREATMENT OF ^{ALL} INMATES IN THE PA DOC. P.O. BOX 598, 2520 LISBURN ROAD, CAMP HILL, PA. 17001-0598; FROM 2005 TIL-TO-DATE! FAILED TO UPHOLD HIS DUTIES; HE IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.
84. DEFENDANT: B. BULTER, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER OF THE STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE ~~DOC~~ CUSTODY - CARE - SAFETY - MEDICAL CARE - N-CONTROL OF ^{ALL} INMATES, 1100 PIKE STREET, HUNTINGDON, PA. 16654-1112. HE IS BEING SUED IN HIS INDIVIDUAL AND OFFICIAL CAPACITY FAILED TO UPHOLD HIS DUTIES FROM 2006 TIL TO DATE!
85. DEFENDANT: HOSLER, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER OF THE STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY - MEDICAL CARE - CUSTODY - N-CONTROL OF THE INMATES. 1100 PIKE STREET, HUNTINGDON, PA. 16654-1112. FROM 2006 TO DATE! FAILED TO UPHOLD HIS DUTIES IS BEING SUED IN HIS INDIVIDUAL AND OFFICIAL CAPACITY.
86. DEFENDANT: B. SMITH, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER OF THE STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. HE IS LEGALLY RESPONSIBLE FOR THE SAFETY - MEDICAL CARE - CUSTODY - N-CONTROL OF THE INMATES. 1100 PIKE STREET, HUNTINGDON, PA. 16654-1112; FROM 2006 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.
87. DEFENDANT: McCLAIN, AT ALL TIMES RELEVANT TO THIS ACTION IS THE CORRECTIONS OFFICER OF THE STATE CORRECTIONAL INSTITUTION HUNTINGDON, DEPARTMENT OF CORRECTIONS. ^{HE IS} LEGALLY RESPONSIBLE FOR THE SAFETY - MEDICAL CARE - CUSTODY - N-CONTROL OF THE INMATES. 1100 PIKE STREET, HUNTINGDON, PA. 16654-1112; FROM 2006 TIL TO DATE! FAILED TO UPHOLD HIS DUTIES IS BEING SUED IN HIS OFFICIAL AND INDIVIDUAL CAPACITY.

<u>NAMES :</u>	<u>POSITION</u>	<u>PLACE OF EMPLOYMENT :</u>
1. HARMAN	LIEUTENANT	HUNTINGDON
2. JOHNSON	"	"
3. G. WALTER	"	"
4. BAIRD	"	"
5. MOZINGO	"	SCI- FAYETTE
6. CRUMB	"	"
7. GEORGE REPOSKY	"	"
8. TON TUSTIN	"	"
9. MARY LOU STEWALTER	HEALTH CARE ADMINISTRATOR	SCI- HUNTINGDON
10. ROBERT TRETINIK	"	" - FAYETTE
11. MS. MILLS	PAC (PHYSICIAN'S ASSISTANT)	SCI-HUNTINGDON
12. CHRIS MEYER	"	SCI-FAYETTE
13. DR. ROMEO	DOCTOR	SCI-HUNTINGDON
14. DR. ARAGINEDA	"	SCI-HUNTINGDON
15. DR. SOLOMON	"	SCI-HUNTINGDON
16. DR. KLEMECK	"	SCI-HUNTINGDON
17. DR. ROBERT ATLMAN	"	SCI-HUNTINGDON
18. DR. HERBIK	"	SCI-FAYETTE
19. MS. BARBARA W. HOLLI BAUGH	UNIT MANAGER	SCI-HUNTINGDON
20. SCOTT WALTERS	"	"
21. CHARLES POWLEY	"	SCI-FAYETTE
22. MICHAEL ZAKEN	"	SCI-FAYETTE
23. AMY E. GENTER	COUNSELOR	SCI-HUNTINGDON
24. A. GENT, STANLEY	"	"
25. PATTY HERRARD	"	SCI-FAYETTE
26. CHRISTINA GORBIN	"	"
27. ROY BARNES	"	"
28. SEST. JOHNSON	SEKREANT	SCI-HUNTINGDON

29. SGT. MIRABELIA	SERGEANT	SGT-HUNTINGDON
30. SGT. LILLA	"	"
31. SGT. STIMPERT	"	SGT-FAYETTE
32. YOUNKER	CORRECTIONS OFFICER	SGT-HUNTINGDON
33. MCKNIGHT	"	"
34. B. CRASMYER	"	"
35. R. PROCTOR	"	"
36. RHODES	"	"
37. MR. MILLS ON 6-2 SHIFT	"	"
38. MR. MILLS ON 12-10 SHIFT	"	"
39. LONG	"	"
40. BARTLEY	"	"
41. TADDEI	"	"
42. LEHMAN	"	"
43. YEDOLSKI	"	"
44. YOST	"	"
45. D. DECKER	"	"
46. S. C. BERGER	"	"
47. EVERHART	"	"
48. HALL	"	"
49. MR. SHAWALTER	"	"
50. DONALDSON	"	"
51. R. A. STEUER	"	"
52. DOBRYZENSKI	"	SGT-FAYETTE
53. PEATRACK	"	"
54. KOVAL	"	"
55. MITCHER/OR KICHEY	"	"
56. MARK POWELL	"	"
57. HAYDEN	"	"
58. B. EGAN	"	"

NAME

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~~ROSETTAN~~

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59. SNYDER	CORRECTIONS OFFICER	SCI-FAYETTE
60. CRUTCHMAN	" "	" "
61. SHARON M. BURKS	CHIEF GRIEVANCE OFFICER COORDINATOR	PA. DEPARTMENT OF CORRECTIONS
62. JEFFREY A. BEARD	PA DOC COMMISSIONER	" " " "
63. JOHN S. SCHAFER	EXECUTIVE DEPUTY COMMISSIONER	" " " "
64. WILLIAM S. STEWART	DEPUTY COMMISSIONER	" " " "
65. MICHAEL A. FARNAN	DIRECTOR/CHIEF COUNSEL FOR OF DOC CHAIRMAN'S OFFICE OF GENERAL COUNSEL	" " " "
66. ALAN B. FOGEL	DIRECTOR OF BUREAU OF HEALTH CARE AND FOOD SERVICES	" " " "
67. B. BALTER	CORRECTIONS OFFICER	SCI HUNTINGDON
68. B. SMITH	" "	" "
69. McCLAIN	" "	" "
70. HOSLER	" "	" "
71. DAVID J. WAKEFIELD	WARDEN	" "
72. JAMES L. GRACE	"	" "
73. MELVIN S. LOCKETT	DEPUTY " "	" "
74. R. M. LAWLER	" "	" "
75. S. GLUNT	MAJOR OF UNIT MANAGEMENT	" "
76. FISHER	MAJOR	" "
77. KAUFFMAN	CAPTAIN OF SECURITY	" "
78. HARRY E. WILSON	WARDEN	SCI-FAYETTE
79. LIND HARRIS	DEPUTY WARDEN	" "
80. MARK KRYSEWIC	" "	" "
81. CAROL SCIRE	WARDEN'S ASSISTANT	" "
82. MANCHAS	CAPTAIN OF SECURITY	" "
83. DORINA VARNER	WARDEN ASSISTANT	SCI HUNTINGDON
84. SCOTT NICKELSON	CAPTAIN	SCI FAYETTE
85. T. HOLTZ	LIEUTENANT	SCI HUNTINGDON
86. ROBERT ALTMAN	PSYCHIATRIST	" "
87. J. EWING	LIEUTENANT	" "
88. R. COOPER	" "	" "

V. Relief

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)

1. ~~IMMEDIATE PERMANENT RESTRAINT ORDER / PERMANENT INJUNCTION, WHICH ENTERS THE IMMEDIATE~~
~~SEPARATION FROM ALL SOUTH HUNTINGDON STATE AND ALL PA DOC STAFF ON ANY IN-ALL PRISONS LOCATED IN NORTHERN-CENTRAL-WESTERN, PA, VIA AN IMMEDIATE TRANSFER TO THE FURTHEST LOCATED FACILITY IN EASTERN PA LOCATED OUTSIDE OF NORTHERN-CENTRAL-WESTERN, PA, AND SOUTH HUNTINGDON; IMMEDIATE ACCESS TO SPECIALISTS FOR SEVERAL SERIOUS HEALTH PROBLEMS, CHRONIC ILLNESS~~
2. ~~COMPENSATORY-PUNITIVE-AND-NOMINAL DAMAGES; MONEY DAMAGES; INJUNCTIVE RELIEF; IMMEDIATE RELIEF FOR MENTAL OR EMOTIONAL INJURY; DESTRUCTION OF MY LEAD MATERIAL AND PHOTO EXHIBITS, AND A COLLECTION OF CLASSIC/COLORADO, TITLES OF RECREATION LITERATURE, AND THE SABOTAGE OF MY PERSONAL PROPERTY; LEGAL EXPENSES; ASSIGNMENT TO A PERMANENT FULL TIME EIGHT (8) HOUR A DAY JOB~~
3. ~~REPEAL OF THE DEFENDANTS PERMANENT REMOVAL FROM PA DOC JOBS AND PERMANENT EXCLUSION FROM ANY IN-ALL STATE AND FEDERALLY FUNDED JOBS~~

Signed this 3rd day of MAY, 2007.

Henry Cencel Washington
 (Signature of Plaintiff)

I declare under penalty of perjury that the foregoing is true and correct.

5-3-2007
 (Date)

Henry Cencel Washington
 (Signature of Plaintiff)

HENRY UNSELD WASHINGTON
PLAINTIFF

V.
JAMES L. GRACE - DAVID J. WAKEFIELD - DORINA
VANNER - MELVIN S. LOCKETT; R. M. LAWLER - HARRY
WILSON - LINDA D. HARRIS - MARK KRYSEVIG - CAROL
SCIRE - S. GLUNT
DEFENDANTS

{
{ (CASE NUMBER)
} MOTION FOR APPOINTMENT
} OF
} COUNSEL
{

PURSUANT TO 28 U.S.C. §§ 1915 (E) (1) PLAINTIFF MOVES FOR AN ORDER APPOINTING
COUNSEL TO REPRESENT HIM IN THIS CASE. [REDACTED] IN SUPPORT OF THIS MOTION, PLAINTIFF STATES:

1. PLAINTIFF IS UNABLE TO AFFORD COUNSEL. HE HAS REQUESTED LEAVE TO PROCEED IN FORMA PAUPERIS.

2. PLAINTIFF'S IMPRISONMENT WILL GREATLY TO LITIGATE, THE ISSUES INVOLVED IN THIS CASE ARE

COMPLEX, AND WILL REQUIRE SIGNIFICANT RESEARCH AND INVESTIGATION. PLAINTIFF HAS LIMITED AC-
CESS TO THE LAW LIBRARY AND VERY LIMITED KNOWLEDGE OF THE LAW, e.g. PLAINTIFF IS IN SOLITARY CONFINEMENT,

THERE ARE NO! LAW BOOKS, CLERKS, PHOTO COPYERS MACHINES; SELDOM ARE OUR REQUEST FOR CASE

OF LAW EVER ANSWERED. EVEN THE MIDDLE DISTRICT HAS IMPLIED THAT PLAINTIFF LACK LEGAL SKILLS; PLAINTIFF

HAS A 5TH GRADE READING COMPREHENSION SKILLS; THERE IS NO SET DATE FOR WHEN PLAINTIFF WILL BE

RELEASED FROM SOLITARY CONFINEMENT

3. PLAINTIFF IS UNABLE TO AFFORD COUNSEL,

4. A HEARING, AND FOLLOWED BY A 42 U.S.C. 1983 CIVIL RIGHTS COMPLAINT, AND A TRIAL IS LIKELY WHICH

VOLVE CONFLICTING TESTIMONY, AND COUNSEL WOULD BETTER ENABLE PLAINTIFF TO PRESENT EVIDENCE AND CROSS EXAMINE

ADJURE WITNESSES

5. PLAINTIFF SUFFERED A HEART ATTACK, WHEREAS TO DATE! IS STRUGGLING TO BREATHE, IMPAIRED MOVEMENT

IN LEFT ARM-AT SHOULDER - FORCED TO WALK WITH PAIN IN MY CHEST LEFT TEMPLE, WHEREIN IT HAS TAKEN ME MORE

THAN THREE WEEKS TO COMPLETE THIS MOTION

6. PLAINTIFF HAS ~~MADE~~ MADE REPEATED EFFORTS TO OBTAIN A LAWYER TO DATE! RESPONSES HAVE ALL BEEN NO ANSWER.

WHEREFORE, PLAINTIFF'S REQUEST THAT THE JUDGE REJECT APPOINT EITHER OF THE FOLLOWING ATTORNEYS: SCHNADER-HARRIS-SEGAL-LEWIS; JOAN SIGGS; CHARLES OULTREE; MICHAEL COARD; ROY BLACK; RON KUBY; GEOFFREY FIEGER; ALAN DERSHOWITZ; MILTON GRIMES; GOLDBERG-KATZMAN-SHIPMAN; ERNEST D. PREATI; ALL MEMBERS OF THE PENNSYLVANIA BAR; AS COUNSEL ON THIS MOTION AND THE ATTACHED 42 U.S.C. 1983 CIVIL RIGHT COMPLAINT AND MOTION FOR A TEMPORARY RESTRAINING ORDER AND PERMANENT INJUNCTION. ALL OF THE FOREMENTIONED ATTORNEYS, AND I HAVE EXCHANGED LETTERS OVER THE LAST FEW MONTHS SO I HAVE CONFIDENCE THAT AS MY ATTORNEY THEY WILL PURSUE EVERY ISSUE WITH PASSION. EACH ONE ~~PRACTICE~~ PRACTICE IN THE STATE OF PA., THEREFORE ALL ARE QUITE VERSED IN PENNSYLVANIA LOCAL RULES OF THE COURT, AND FEDERAL RULES OF CIVIL PROCEDURE, AND FAMILIAR WITH ISSUES SURROUNDING THIS CASE.

"RESPECTFULLY SUBMITTED"
S/Henry Unsel Washington

DATED: 5-3-2007

HENRY UNSELD WASHINGTON
AM 3036
SCF/HUNTINGDON
1100 PINE ST
~~PA 16654-1112~~ PA 16654-1112
HUNTINGDON,

HENRY UNSELD WASHINGTON
PLAINTIFF

v.

JAMES L. GRACE; DAVID J. WAKEFIELD; DORINA
VARNER; MELVIN S. LOCKETT; R. M. LAWLER; HARRY
WILSON; LINDA D. HARRIS; MARK KRYSENZ; CAROL
SCIRE; S. BLUNT

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(CASE REMOVED)

MOTION FOR A TEMPORARY RESTRAINING ORDER AND

PRELIMINARY INJUNCTION

MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR A TRO/PRELIMINARY INJUNCTION

STATEMENT OF THE CASE

THIS IS A CIVIL RIGHTS ACTION BROUGHT UNDER 42 U.S.C. SEC. 1983, BY A PRISONER WHO EXERCISE OF RELIGIOUS RIGHTS, ACCESS TO THE COURTS, AND ACCESS TO ALL FORMS OF SERIOUS MEDICAL TREATMENT GUARANTEED BY THE 1st AND 8th AMENDMENTS OF THE U.S. CONSTITUTION, AND "RELIGIOUS LAND USE AND INSTITUTIONALIZED PERSONS ACT OF 2000 (RLUIPA)". THE PLAINTIFF SEEKS A TEMPORARY RESTRAINING ORDER AND A PRELIMINARY INJUNCTION TO ENSURE THAT HE RECEIVES IMMEDIATE ACCESS TO 'SPECIAL TESTS', SAFETY IN A PRISON LOCATED OUTSIDE OF NORTHERN-CENTRAL-WESTERN, PA., HIS RELIGIOUS BOOKS AND RELIGIOUS LITERATURE, AND ALL OF HIS LEGAL MATERIAL PERTAINING TO 'THREE' ACTIVE CASES, INCLUDING DOCUMENTS PERTAINING TO THIS PRESENT ACTION, WASHINGTON V. KLEM, NO. 05-2351 AND WASHINGTON V. COMMONWEALTH OF PENNSYLVANIA, AND LEGAL EXHIBITS WILL NOT BE DESTROYED.

STATEMENT OF FACTS:

THESE ARE LEGAL DOCUMENTS AND EXHIBITS PERTAINING TO 'THREE' ACTIVE CASES, A CRIMINAL CASE: THIS PRESENT ACTION, AND WASHINGTON V. KLEM, NO. 05-2351. THE PRESENT COMPLAINT WHERE PLAINTIFF'S ALLEGING DENIAL OF ACCESS TO THE COURTS, RELIGIOUS EXERCISE, AND RIGHTS UNDER 'RLUIPA', THE RELIGIOUS BOOKS AND LITERATURE, AND EXHIBITS WHICH SO FAR HAVE BEEN DESTROYED SOLELY FOR THE SAKE OF ACTUATION. WHEREAS EVIDENCE THAT WILL PROVE MY 'RLUIPA' CLAIM, AND MY ACTUAL INNOCENCE IN PLAINTIFF'S CRIMINAL CASE, WASHINGTON V. COMMONWEALTH OF PENNSYLVANIA. THROUGHOUT THE PA. DOC IMMAGES WITH A STATE CASES WHO POSSESS EXCESS BOXES OF LEGAL MATERIAL ARE FREELY GRANTED APPROVAL FOR THEIR EXCESS BOXES OF LEGAL MATERIAL. IT IS UNHEARD OF FOR AN INMATE WITH JUST ONE (1) ACTIVE CASE NOT TO BE APPROVED. PLAINTIFF HAS 'THREE' ACTIVE CASES. EVEN THOUGH SCI-HUNTINGDON ADMINISTRATION

THEY IS ALL BEING ANSWERED BY ~~THEY~~ 'RACISM' AND 'REVENGE' WITH ^{OUT THE} LEGAL DOCUMENTS PLAINTIFF IS PLACED IN A 'LOSE-LOSE' SITUATION IN ALL THREE CASES. THESE ARE BLATANT VIOLATIONS OF PLAINTIFF'S FIRST AMENDMENT RIGHTS OF ACCESS TO THE COURT, RELIGION, AND RLUIPA.

SCI-HUNTINGDON HEALTH CARE ADMINISTRATOR: MS. MARY LOU SHAWALTER IS BLATANTLY DENYING PLAINTIFF'S ACCESS TO 'SPECIALISTS' FOR SEVERAL SERIOUS HEALTH PROBLEMS HER OWN! SCI-HUNTINGDON-PAC: MS. MILLS, ALREADY ON 'TWO' (2) DIFFERENT OCCASIONS, DECLARED SHE CANNOT 'CURE OR CORRECT'; i.e.

(1) UNCONTROLLABLE DRIPPING OF 'SEMEN'-N-URINE, DUE TO A CRC STIFF INFLECTED INJURY, (2) DUE TO ANOTHER STIFF INJURY PERIODICALLY ON A DAILY BASIS I AM UNABLE TO RAISE MY VOICE ABOVE A WHISPER, (3) CHRONIC DIGESTIVE DISORDER (4) DRASTIC LOSS OF WEIGHT-MUSCLE MASS-STRENGTH-STAMINA-ENDURANCE-ENERGY, AND CONSTANT-N-CONTINUOUS FATIGUE-EXHAUSTION-DEPRESSION, (5) IRREVERSIBLE FOOT FUNGUS (6) GENITAL ATROPHIED DEMORPHISM, (7) AN OPEN SORE ON THE SKIN OF MY PENIS WAS ALLOWED TO FESTER FOR MORE THAN A MONTH, NO TREATMENT-N-NO EXPLANATION AS TO WHY IT OCCURRED

MEDICATIONS AND TREATMENTS FOR LONG TERM CHRONIC ATTLEMENTS, i.e. FIFTY SEVEN (57) TWELVE (12) AND TEN (10) YEARS ALL DISCONTINUED WILL-NILLY

THESE DENIALS OF 'SERIOUS' MEDICAL TREATMENT IS BEING CONDUCTED SOLELY FOR THE SAKE OF RETALIATION. THIS IS A BLATANT VIOLATION OF PLAINTIFF'S 8TH AMENDMENT RIGHTS.

DUE TO CURRENT ON-GOING THREATS BY SCI-HUNTINGDON STAFF TO 'KILL' HIM OR HAVE PLAINTIFF 'KILLED' IF HE IS PLACED IN THE SCI-HUNTINGDON INMATE POPULATION IN ANY-N-ALL PRISONS LOCATED IN NORTHERN CENTRAL-WESTERN, PA

SEVERAL TIMES OVER PLAINTIFF HAS GIVEN 'NAMES'-N-'SPECIFICS' TO ^{SCI-}HUNTINGDON ADMINISTRATION, i.e. WARDEN-WARDEN'S ASSISTANT-BOTH DEPUTY WARDEN-HEALTH CARE ADMINISTRATOR-TWO UNIT MANAGERS-TWO COUNSELLORS-PSYCHIATRIST CO-ORDINATOR-PSYCHOLOGIST-TWO PSYCHIATRISTS, etc THEREFORE, THE SCI-HUNTINGDON, ~~ADMINISTRATION~~

~~ADMINISTRATION~~ ADMINISTRATION IS 'ACUTELY AWARE' OF 'ALL' OF THE ISSUE RAISED IN THIS MOTION e.g. 1. H17-2006, PLAINTIFF'S VERY FIRST DAY IN SCI-HUNTINGDON. WHILE BEING ESCORTED TO THE RHU STRIPPING-N-INTAKE AREA ON 3-2006 BY JOHN DOE #1 AND JOHN DOE #2, TWO WHITE MALE OFFICER, WHO THREATENED TO 'BACK' MY HEAD IN ON BEHALF OF SCI-FAYETTE CAPTAIN: SCOTT NECKELSON, AND LIEUTENANT: GEORGE REPOSKY, WHILE IN RETURN ROUTE THE VERY SAME TWO IDENTICAL SCI-HUNTINGDON OFFICERS THREATENED TO 'BACK' MY 'FUCKIN NECK' FOR REMARKS PLAINTIFF HAD MADE ABOUT SCI-FAYETTE'S LIEUTENANT: DON TUSTIN, OFFICER: MARK J. POWELL AND HEALTH CARE ADMINISTRATOR: ROBERT ~~TRETINICK~~ TRETINICK.

2. ON 1-18-2006, ~~CASE 4:07-cv-00887-JEM Document 1-1 Filed 06/14/17 Page 24 of 44~~ SCIE-HUNTINGDON PRISON, 1 DECEMBER 2006, PLAINIFF DECLARED THAT MY HES DUES FOR ALL OF THE THINGS HE'D SAID ABOUT SCIE-FAYETTE'S HEALTH CARE ADMINISTRATOR: ROBERT TRETENCK, AND PARTICIPANTS MEYER. SHE DECLARED THAT SHE TOO CANNOT! 'CURE OR CORRECT' NONE OF HIS HEALTH PROBLEMS. DISCONTINUED MEDICATIONS AND TREATMENTS FOR 'CHRONIC ILLMENTS'. THIS TOOK PLACE DURING SICK CALL.
3. ON 1-19-2006, DURING SICK CALL, SCIE-HUNTINGDON PRISON, D. MILLS, 'AGAIN', DECLARED THAT SHE CANNOT 'CURE OR CORRECT' ANY OF HIS HEALTH PROBLEMS, PLAINTIFFS WILL NEVER! BE SEEN BY SPECIALISTS. PLAINTIFF'S DUES WERE NOT STARTING, AND HE WOULD REGRET ALL OF THE THINGS HE'D SAID ABOUT FAYETTE'S HEALTH CARE ADMINISTRATOR: ROBERT TRETENCK, AND PARTICIPANTS MEYER. THEN, SHE GAVE ME A DIRECT ORDER NOT! TO STAY IN PRISON DURING SICK CALL AGAIN FOR ANY OF THE SAME (UNAPPROVED) HEALTH PROBLEMS ELSE SHE WOULD SUIT MY HAND, CHARGE PLAINTIFFS AND WILL NOT RECEIVE MEDICAL CARE.

4. ON 1-30-2006, SCIE-HUNTINGDON OFFICERS: R. PRICKOP AND S. GRASMEYER, ESCORTED PLAINTIFF TO THE PROPERTY ROOM, WHILE IN ROUTE, HE WAS TOLD THAT BECAUSE HE LEAVE THE PRISON THEY WERE GOING TO 'KICK MY TEETH IN'. WHILE IN THE PROPERTY ROOM, THEY WERE JOINED BY OFFICERS: MCKNIGHT AND YOUNKER. PLAINTIFF DISCOVERED HIS FOOT LOCKER TO BE 'HEAVILY DAMAGED' AND THE ANTENNA ON HIS RADIO ALTERED. PLAINTIFF WAS FORCED! TO STAY IN FRONT OF AN OPEN DOOR WITH A FAN BLOWING AIR IN AT FULL SPEED FOR NEARLY AN HOUR. THIS OCCURRED ON A FREEZING COLD NIGHT IN MID-WINTER. I WAS TOLD THAT THEY'D RECEIVED WORD FROM SCIE-FAYETTE OFFICERS: DOBRZYNSKI, PEASTRACK, D. EVANS, SNYDER, CATCHAM, SGT. BURNETTE, SGT. SHWERT, LT. MOZINAC, JUNET MANN, SER. MICHAEL ZAKEN, ALL STATING THAT PLAINTIFF HAD BEEN A 'PRECK' AND NEEDED TO BE TAUGHT A LESSON, AND BECAUSE OF THAT BEHAVIOR HE WAS GOING TO LEAVE SCIE-HUNTINGDON 'IN A BOX'. DURING THE RETURN ROUTE: OFFICERS: S. GRASMEYER AND R. PRICKOP, ASKED HIM DID HE KNOW THE FEELINGS OF SEEING DEATH APPROACHING, AND NOT BEING ABLE TO AVOID IT. WELL, HE'D BETTER GET USED TO BECAUSE HIS DAYS WERE NUMBERED, WHETHER AT THIS FACILITY OR ANY OTHER PRISON IN NORTHERN-CENTRAL-WESTERN, PA.

5. BETWEEN, 3-31-2006, TO 3-24-2006, URINE TEST. PLAINTIFF DO NOT! USE OR SELL DRUGS; NEVER! HAS. THIS WAS OBVIOUSLY A RETALIATORY PUNITIVE ACT.

6. ON 3-24-2006, WHILE ESCORTING INMATES TO THEIR 'NEW CELLS', OFFICER: YOUNKER, AS HE CAME PASS PLAINTIFF'S CELL ON A3, 2037, HE BANGED ON THE PLAINTIFF'S CELL DOOR AND STEEL SCREENS COVERING THE WINDOWS. OFFICER YOUNKER COMMITTED THIS ACT THREE DIFFERENT TIMES, SAYING 'YOU CAN'T HIDE WASHINGTON, SHAKING HIS STICK UP IN THE JAIL'.

7. 3-30-2006, OFFICER: YOUNKER, 'THREE' TIMES BANGING ON THE CELL DOOR AND IT BEING 'AGAIN' MADE THE INMATES GO TO THE DOOR, AND BUILD UP FOR FURTHER BANGS. THIS OCCURRED ON THE SECOND TIER, WHEN PLAINTIFF WAS IN CAB, 2037.

8. ON 4-7-2006, PAGE 407 OF DOCUMENT DATED 05/14/02, PAGE 22 OF 44 THREE DOCUMENT

DR. KAYLOR WAS RETURNING TO THE PLAINTIFF. ALL THREE DOCUMENTS WERE DAMAGED, LETTER FROM DR. KAYLOR UN-
TOUCHED

9. ON 3-22-2006, LETTER FROM MOTHER 'DAMAGED'

10. IN MID-APRIL, 2004, PLAINTIFF'S LONG TERM CHRONIC MEDICATION FOR HIGH BLOOD PRESSURE DISCONTINUED 'WILLY NILLY'

11. OFFICER: SHODWALTER, WHO'S A RELATIVE OF THE HEALTH CARE ADMINISTRATOR, MS. M. L. SHODWALTER, ON 5-8-2006, PURPOSELY 'THREW' THE PLAINTIFF'S BREAD ON THE FLOOR DURING THE EVENING MEAL; THEN HE DECLARED TO THE PLAINTIFF: 'NO MEDICAL CARE, NOW! YOU DON'T GET CLEAN BREAD. THIS OCCURRED ON 2-10

12. ON 5-9-2004, WHILE RETURNING FROM EVENING YARD BEING ESCORTED BY MILLS ON THE 2-10 SHIFT, HE MOCKED PLAINTIFF CONCERNING THE FACT HIS FELLOW WERE VOWING TO 'KILL' THE PLAINTIFF.

13. ON 5-14-2006, OFFICER HALL UNDER THE GUISE OF TAKING THE PLAINTIFF TO THE PROPERTY ROOM, WHILE STANDING JUST OUTSIDE PLAINTIFF'S CELL DOOR IN HANDCUFFS PLAINTIFF WAS TOLD BY OFFICER HALL, THAT HE WOULD 'KNOCK THAT 'SHIT EATING' SMILE OFF OF THE PLAINTIFF'S FACE, THEN PLACE IT ON THE BACK OF HIS HEAD.

14. ON 5-21-2006, SOLELY FOR PUNITIVE RETALIATORY PURPOSES, LIEUTENANT T. HOLTZ, THE RHN LIEUTENANT BLATANTLY REFUSED TO ALLOW PLAINTIFF TO RETRIEVE 'BONA FIDE' LEGAL -N- RELIGIOUS LITERATURE. THIS IS A RIGHT WHICH IS FREELY EXERCISED DAILY THROUGHOUT THE PA. DOC, PURSUANT TO DOC POLICY. OFFICER: MILLS ON THE 2-10 SHIFT, PURPOSELY -N- STRATEGICALLY POSITIONED HIMSELF TO BE AT THE DA REAR BATE SO AFTER HAVING ENCOURAGED LT. HOLTZ TO CONDUCT THIS PUNITIVE MEASURE, OFFICER MILLS TAUNTED PLAINTIFF.

15. SCI-HUNTINGDON'S HEALTH CARE ADMINISTRATOR: MS. M.L. STOWALTER HAS RELATIVES EMPLOYED IN THE PRISON, WHO WORK THROUGH OUT THE INSTITUTION, INCLUDING THE RHU, AS MENTIONED IN #11; AND PAC, MS. D. MILLS HAVE SEVERAL CLOSE RELATIVES WHO ARE EMPLOYED AT SCI-HUNTINGDON, WHO ARE ASSIGNED TO DUTIES THROUGHOUT THE INSTITUTION, ONE BEING OFFICER MILLS ON 6-2 SHIFT, THE 'HUS BAND'; AND OFFICER MILLS ON 2-10 SHIFT HER BROTHER-IN-LAW, AND THE BROTHER TO HER HUSBAND, REFERRED TO AT #12 AND #14; BOTH OFFICERS ARE ASSIGNED TO THE BLOCK I AM HOUSED, AND THROUGHOUT THE PRISON, THEREBY, IS ONE OF MANY REASONS PLAINTIFF IS NOT! SAFE! IN SCI-HUNTINGDON, OR ANY-N-ALL PRISONS LOCATED IN NORTHERN-CENTRAL-WESTERN, PA.

16. IT IS INEVITABLE THAT THE SCI. HUNTENBORN ADMINISTRATION IS GOING TO RETALIATE AGAINST PLAINTIFF IN A VIOLENT MANNER FROM THE MOMENT THE LETTER IS RECEIVED BY THE ATTORNEY GENERAL'S OFFICE - GIVEN A LOCKET NUMBER FOR THE INDIVIDUALS RECEIVE THEIR MATERIAL FORMS. PLAINTIFF IS VIOLENTLY 'AFRAID' FOR 'MY LIFE'

17. ON 6-3-2006, OFFICER MILLS, G-2 SHIFT, THE HUSBAND OF PFC MS. MILLS, WENT ON A TYRARD IN RESPONSE TO PLANTIFF ASKING FOR A QUIET SLEEP. IT IS CLEARLY EVIDENT THAT HIS RESPONSE WAS IN RETALIATION FOR THE SAKES DEFENDERS HIS WIFE.

18. ON 6-4-2006, OF CASE 4:07-cv-00867-JED Document 1 Filed 05/14/07 Page 23 of 44
NOT CUT. PLAINTIFF PERSONALLY OBSERVED SEVERAL PAIRS OF NAIL CLIPPERS IN THE BOX UNASSIGNED.
19. ON 6-28-2006, OFFICER G.C. BERGER **FORCED** ME TO KEEP A BLANKET THAT SMELLED SO AFOUL IT WAS AS IF THE BLANKET HAD BEEN SOAKED IN URINE. ALTHOUGH OFFICER BERGER WAS AWARE THAT THE BLANKET'S FOUL SMELL BECAUSE HE LEFT PLAINTIFF'S CELL DOOR. PLAINTIFF ALSO MADE HIM AWARE OF ISSUING HIM A JUMP SUIT WITH ABSOLUTELY NO BUTTONS WHICH OFFICER BERGER FORCED PLAINTIFF TO KEEP.
20. ON 6-29-2006, OFFICER MILLS, ON 2-10 SHIFT WAS SENT TO MY CELL DOOR, D4311037, BY OFFICER G.C. BERGER, WHO TOLD OFFICER MILLS THAT HE HAD BEEN FORCED TO KEEP A URINE SOAKED BLANKET, AND NOW THAT I'D RETURNED FROM THE NUT HOUSE SCI-HUNTINGDON STAFF WERE GOING TO POUND SOME SENSE INTO MY HEAD WITH THEIR NIGHT STICKS.
21. ON 6-29-2006, OFFICER MILLS, 2-10 SHIFT, AND BERGER DENIED MY EVENING MEAL.
22. ON 6-30-2006, OFFICERS G.C. BERGER AND MILLS, ON 2-10 SHIFT DENIED PLAINTIFF THE EVENING MEAL.
23. ON 6-30-2006, DR. ROBERT ALTMAN, PSYCHIATRIST, DECLARED TO PLAINTIFF THAT ASSAULTS BY GUARDS ARE A PART OF NORMAL EVERYDAY PRISON LIFE. SOME INMATES ARE BLESSED TO HAVE THE EXPERIENCE TWO-THREE TIMES. WHY ALL THE BULLYING, IF IT HAPPENS, IT HAPPENS.
24. 7-2-2006, OFFICER MILLS, 2-10 SHIFT, DELIBERATELY GAVE PLAINTIFF A PAGE OF NAIL CLIPPERS THAT WOULD NOT CUT. OFFICER MILLS, SPITEFULLY WITHHELD TOILET PAPER UNTIL MOMENTS BEFORE THE SHIFT CHANGE. OFFICER MILLS HAD USED THESE RETALIATORY TACTICS IN THE PAST.
25. 7-3-2006, MS. AMY R. GINTER, PLAINTIFF'S COUNSELOR, HAVING PURPOSELY MISLEADING PLAINTIFF FOR SEVERAL MONTHS CONCERNING THE PURPOSE OF HAVING TRANSPORTED HIM TO SCI-WAYMART'S SAU. AS MS. AMY R. GINTER, TOLD PLAINTIFF TWICE AND TWICE A WEEK FOR THE (6) STRAIGHT MONTHS THAT HE WAS BEING TRANSPORTED TO SCI-WAYMART TO RECEIVE MEDICAL TREATMENT BY 'SPECIALISTS' FOR SEVERAL SERIOUS PHYSICAL HEALTH PROBLEMS THAT ALL PA, DOC DOCTORS - N-PACS, INCLUDING SCI-HUNTINGDON'S OWN! PAC, HAD ALREADY DECLARED THREE, SHE; MS. DONNA MILLS, THE PAC CAN NOT 'CURE OR CORRECT', WHEREAS, IN ALL ACTUALITY SCI-HUNTINGDON'S PURPOSE FOR HAVING PLAINTIFF TRANSPORTED TO SCI-WAYMART WAS TO HAVE HIM PLACED IN WAYMART'S SAU, FOR A PSYCHIATRIC EVALUATION FOR THE SAKE OF FORCIBLY INJECTING PLAINTIFF WITH PSYCHOLOGICAL DRUGS, THUS 7-3-2006, WHEN PLAINTIFF REQUESTED HIS COUNSELOR CONCERNING HER HAVING LIED TO HIM, SHE RESPONDED IN CIRCUMLOCUTION IN HER ATTEMPT TO JUSTIFY HER HAVING DELIBERATELY LIED TO HIM.
26. ON 7-3-2006, G-BLOCK OFFICERS: TADDEI-YOUNKER-MCKNIGHT-PROKOP, EXPLOITED THE OPPORTUNITY OF BRINGING PLAINTIFF INTO THE PRISON AS THE LAST PERSON; PLAINTIFF WAS THREATENED, THEY ALL WERE SAYING THEY WERE GOING TO 'KILL' HIM, THERE WAS NO PLACE FOR HIM TO HIDE IN NORTHERN-CENTRAL-N-WESTERN, PA.
27. ON 7-6-2006, OFFICERS G.C. BERGER-DECKER-MILLS, 2-10, WITHOUT ACCOMpanyING PLAINTIFF TO A NEW CELL

DA3-3030, FROM Case 74-074 OFFICE OF THE ATTORNEY GENERAL, PLAINFIELD, N.J. FILED 05/11/57 Page 24 of 40. HLM.

28. ON 7-10-2006, OFFICER: MILLS, 2ND SHIFT, AGAIN DENIED PLAINTIFF TOILET PAPER FROM, 2 P. M. -TIL- AFTER 5: P. M.

29. ON-7-10-2004, DURING BREAKFAST A G-BLOCK OFFICER, SERVING BREAKFAST, "PURPOSELY" THREW ^{PLAINTIFFS} ~~THE~~ FRUIT-BREAD-N-MILK ON THE FLOOR. THEN DECLARED, ^{HE} ~~HE~~ WAS GOING TO GET MORE OF THE SAME TREATMENT ONCE PLAINTIFF SET ONE FOOT INTO SCI-HUNTINGDON INMATE POPULATION, THERE AINT NO PLACE THE PLAINTIFF CAN HIDE IN NORTHERN-CENTRAL-WESTERN, PA.

30. ON 7-21-2006, OFFICER: TADDEI LED THE ROUNDS OF THREATS - MOCKING - N - TAUNTS. OFFICER: TADDEI VOICE TO "KILL" PLAINTIFF, IT WOULD BE A LYNCHING. THERE WAS NO NEED FOR PLAINTIFF TO BE HIDING OUT IN DRESSING ROOMS AT THIS FACILITY OR AT ONE ^{OF} OTHER INSTITUTIONS OF NORTHERN - CENTRAL - WESTERN, PA., THE PLAINTIFF WAS GOING TO DIE

3). ON 7-25-2006, DURING THE RETURN TRIP FROM THE EXERCISE YARD, OFFICER YOUNKER MADE THREATENING GESTURES TO ^{PLAINTIFF} WARD ~~HE~~ WITH HIS NIGHT STICK IN HAND.

32. ON 8-1-2006, WHILE RETURNING FROM THE EXERCISE YARD DURING THE AFTERNOON, AS ^{PLAINTIFF} ~~HE~~ PASSED OFFICER BRASSMYER ON THE THIRD FLOOR OF DAB, HE SPAT SNUFF/~~OR~~ TOBACCO JUICE ON HIM. IT WAS EVIDENT THAT THIS WAS AN ATTEMPT TO SPIT IN PLAINTIFF'S FACE, WHEREIN PLAINTIFF DUCKED CAUSING THE JUICE TO LAND ON HIS BACK-N-SHOULDER. PLAINTIFF WAS GIVEN A DIRECT ORDER TO EXCHANGE HIS JUMP SUIT.

33. ON 8-16-2006, OFFICER: MILLS, 4-2 SHIFT, THE HUSBAND OF PAC. MS. MILLS, AND THE BROTHER TO MR. MILLS ON THE 2-10 SHIFT, FOR THE SECOND TIME WITHIN A WEEK RESPONDED IN A VERY NASTY FASHION WHEN ~~HE~~ ^{PLAINTIFF} ASKED HIM TO SIGN A CASH SLIP. OFFICER MILLS HAD RESPONDED IN LIKE MANNER PRIOR TO THIS DAY SEVERAL TIMES. IT'S EVIDENT THAT OFFICER MILLS' REACTION WERE IN RETALIATION TO PLAINTIFF HAVENS FILED A LEGAL CLAIM WHERE HIS WIFE AND BROTHER WERE BOTH CITED AS DEFENDANTS. . . . N.B. THE LEGAL ACTION FOREMENTIONED WAS PLACED IN OFFICER MILLS' HANDS, ALONG WITH A CASH SLIP, 'INSIDED' OF AN 'UN-SEALED' ENVELOPE. ACCORDING TO THE CLERK OF COURTS, THE U.S. FEDERAL COURTS, THE PA. MIDDLE DISTRICT, THIRD CIRCUIT, VIA A LETTER DATED: 1-29-2007; THE LEGAL DOCUMENTS WERE NEVER RECEIVED.

34. ON 8-17-2006, OFFICER DICKER, USED THE PRETEXT OF CONDUCTING A 'SECURITY CHECK' ON PLAINTIFF CELL, AT JAIL-2016;
THEN WILLIAMS-N-WANTED SEARCHED PLAINTIFF CELL, WHEREIN OFFICER DICKER TOOK A LETTER PLAINTIFF HAD WRITTEN TO THE ARMY(S) M. NANCY WINKELMAN AND EDWARD MARCHESON; AND LEFT THE CHAIRMAN-PUBLIC OFFICIAL-
SAYING, AS REMOVED-TO THE W. BLACKWELL-N-DIVISION PLANS; THEN ALL OF THESE LETTERS WERE SEPARATELY PLACED
ON A 'WET-T-SHIRT', AND LEFT THERE TO DRY TO THE EXTENT WHERE IT COULD BE SEEN. BEHIND ALL, THE SAME
A RETALIATORY PUNISHMENT BEING CONDUCTED ^{ED} WHILE PLAINTIFF WAS A COLOR PERSON THE SAME EXPOSED PERIOD.

5. ON 4-17-2011, OFFICER, C. E. YEDOLSKI, WHILE EVACUATING PLAINTIFF FROM OF THE EXERCISE YARD "STRATEGICALLY" - IN-PURPOSELY, RECENTLY STEPPED ON ~~THE~~ THE HEELS OF PLAINTIFF'S SHOE, THEN OFFICER YEDOLSKI TALKED

PL-10 ON MORE THAN ON OCCASION & OFFICIAL YEARLING HAD INSURED-AS-THAT THE PLAINTIFF CONCERNING HIS DEATH
OFFICIALS WERE GOING TO 'KILL' HIM, OR HAVE PLAINTIFF 'KILLED'

36. On 8-9-2006, OFFICER GRASMEYER, WHILE PLACING HANDCUFFS ON PLAINTIFF WHILE INSIDE OF HIS CAGE DURING THE
ONE OF AFTERNOON EXERCISE YARD OFFICER GRASMEYER GESTURED AS IF HE WAS ASKING GOING TO SMIT TO BACK/SNUFF TAIL
THE PLAINTIFF. OFFICERS GRASMEYER WORKED YARD GATES ON THIS DAY

37. ON 9-21-82, RALPH L. TENANT T. HOLTZ, PURPOSELY AND STRATEGICALLY DENIED THE PLAINTIFF A SCHEDULED LEGAL PHONE CALL.

38 ON 10-5-2001, REID LIEUTENANT T. HOLTZ, ON HIS OWN ACCORD ON 12 TO THE PLAINTEEF'S CELL DOOR, D43-3629, ON THE 3RD FLOOR, THEN AWAKEN PLAINTIFF HAS SLEEP BY SCOLDING PLAINTIFF FOR CONTINUING TO REQUEST TO BE TAKEN TO THE PROPOSED ROOM TO RETRIEVE BOOKS FROM HIS FLOOR 12, LT. HOLTZ SEVERAL TIMES CALLED PLAINTIFF A LIEAR, THREATEN TO PLACE HIM ON 4-FLOOR, AND 6 FLOOR WHERE HE TEACH PLAINTIFF A LESSON, LT. HOLTZ EXCITED AT PLAINTIFF 'I AM GOD' THEN, AFTER LT. HOLTZ HAD LEFT PLAINTIFF'S CELL DOOR HE WAS OVERHEARD TELLING BLACK OFFICER LIEUT. C. BRIDGES AND D. DECKER, TO GIVE PLAINTIFF A MEGAPHONE, IT DOESN'T MATTER WHAT FOR, BEING A SOLDIER TO BE SO, HE'S ALL MORE STUCK

37. AN 10-6-2000, OFFENSE NO. DECKER-A-G. C. BERNER, JR. THE CHARGE OF RHD. LIEUTENANT T. HOLTZ, ACTING COMMANDER DENIED PLAINTIFF TELLER PAPERS, FOR MORE THAN TWENTY (20) SHEETS AT H-10, THEN OFFICER S. C. LEESE. STATED THE PLAINTIFF A MISCONDUCT FOR A BEHAVIOR THAT NEVER OCCURRED. 10-6 SHEET ON A 4000 PAGE AND BEING RECD. WERE NOT TELLER PLAINIFF TELLER PAPER.

70. ON 10-6-2006, THE SHIFT COMMANDER ON THE 6-2 SHIFT GAVE 6-2 BLACK OFFER FOR THE 6-2 OFFERS NOT TO SIGN PLAINTEFF TOILET PAPER. OFFICERS: R. M. KLEINGER & MILLS.

[illegible]

YOU ARE IN NORTH-CENTRAL-WESTERN, PA. YOUR ASS BELONGS TO US. WHEN PLAINTIFF REQUESTED A CONFISCATION SLIP OFFICER DECKER THEREIN TO GIVE HIM A MISCOUNT, PLAINTIFF STATED THAT HE'D GLADLY ACCEPT AS LONG AS A CONFISCATION ITEMS RECEIPT CAME ALONG WITH IT. TO DATE! BOTH OFFICERS AND THE RHU LIEUTENANT, T. HOLTZ HAD REFUSED TO SIGN THE PLAINTIFF A CONFISCATION ITEMS RECEIPT, FOR THE ITEMS THE PURPOSED - IN STRATEGICALLY DESTROYED N.B. THESE WERE COLLECTOR'S ITEMS, WHICH, EACH COULD OF EASILY HAVE GOTTEN \$1,500 OVER THE INTER-NET. THESE WERE ITEMS DONATED TO PLAINTIFF BY PROFESSOR WHO ARE NOW DECEASED. MOST OF THE ARTICLES ARE OUT OF PRINT.

74. ON 10-18-2006, AS PUNITIVE RETALIATORY MEASURE; MINOR IN UNIT MANAGEMENT; S. GLUNT, RHU LIEUTENANT T. HOLTZ; COUNSELOR: MS. AMY R. GENTER, ACTING IN CONCERT HAD PLAINTIFF PLACED IN A FREEZING COLD CELL, SO COLD IT WAS LIKENED TO A WALK-IN FREEZER, WHICH ENFORCED PLAINTIFF TO SUFFERING A HEART ATTACKER. BY MOVING PLAINTIFF FROM D-BLOCK, TO B-BLOCK, C-QUAD-1010 CELL.

75. 11-1-2006, OFFICERS JONES & LEMMAN, CONDUCTED A SECURITY SEARCH OF PLAINTIFF'S CELL, GC-1010; OFFICER LEMMAN PURPOSELY THREW PLAINTIFF'S TOOTHBRUSH AND WASHCLOTH TO THE FLOOR.

76. ON 11-4-2006, OFFICER MILLER, 2-10 SHIFT, WHILE COLLECTING THE RAZORS-N-MIRRORS, SAID TO PLAINTIFF AT THE CELL DOOR, GC-1010, THAT PLAINTIFF'S ASS BELONGS TO HIM NOW.

78. 11-6-2006, OFFICER YOUNKER CAME TO PLAINTIFF'S CELL DOOR, KICKED DOOR, THEN SAID TO PLAINTIFF, "YOU CAN'T HIDE FROM ME", IT IS ROUTINE FOR OFFICER YOUNKER TO MAKE THREATING GESTURES TOWARD PLAINTIFF, SOMETIMES, THREE FOUR TIMES A DAY, ON A DAILY BASIS.

79. ON A DAILY BASIS PLAINTIFF IS SURROUNDED BY THE EXACT VERY SAME SCI-HUNTENEDON STAFF WHO ARE CURRENTLY THREATENING TO KILL OR HAVE KILLED, WHO ARE NOW THREATENING THE PLAINTIFF FROM 6:00 A.M. - 10:00 P.M., ALSO INCLUDE, HART-MILLER-STEVEN-REYNOLDS-LEUNG-LT. JOHNSON-LT. EVANS-EVERY REGULAR OFFICER THAT WORK B-BLOCK SCOTT-BARR-YOST-DONALDSON-SNYDER-BOLA-LT. T. HOLTZ-LT. WALTER-SSG. MERABELLA-SSG. LILIA-LT. HARMAN-CPT. KATZMAN-MAJORAL-LT. HARRIS-LT. BARR-LT. COOPER-R. M. LAWLER-AND-BY THE WARDEN, DAVID J. WAKEFIELD

SOME BY THEIR HOSTILE ATTITUDE TOWARDS PLAINTIFF UNPLEASANT PLEADS TOWARDS THEM FOR SAFETY-N-HEALTH CARE, NOT ONLY IS PLAINTIFF DENIED YARD, HE IS NEVER GIVEN ENOUGH TIME TO EAT, WHEREIN PLAINTIFF IS FORCED TO EAT THE FOOD ON THE TRAY AND EAT WITH HIS HANDS. PLAINTIFF IS OFTEN FORCED TO ACCEPT THE TRAY WITHOUT BEING SERVED FROM THE TRAY, OR A TRAY WITH A MEAL-SERVING.

77. ON 11-27-2006, OFFICER HART PURPOSELY CALLED BREAD TO FALL TO THE FLOOR DURING BREAKFAST-N-NOON MEALS.

78. ON 12-1-2006, PLAINTIFF'S COUNSELOR AMY R. GENTER, HAVING REFUSED TO VISIT HIM FOR FIVE (5) STRAIGHT WEEKS SHE CAME TO PLAINTIFF'S DOOR, GC-1010, THEN THREATEN HIM, DECLARING SHE COULD CARE LESS IF PLAINTIFF HAD

RECENTLY SUFFERED A ^{'HEART ATTACK'} ~~HEART ATTACK~~ ^{Document} ~~Document~~ ^{FILED 10/14/07 Page 27 of 44} PHYSICALLY BEAT HIM UP
HE WILL NEVER BE AFFORDED ACCESS TO A CARDIOLOGIST, SPECIALISTS FOR HIS MANY HEALTH PROBLEMS - MEDICATION - ALL
HIS LEGAL MATERIAL AND EVIDENCE WERE GOING TO BE DESTROYED, ALL OF HIS RELEASING LITERATURE ~~AND~~ WOULD BE DESTROYED
AND HE WOULD NEVER BE COMPENSATED FOR THE DAMAGES OF HIS FOOT LOCKER - T.V. - RADIO - TYPEWRITER - WATCH. SINCE THE PLAINTIFF
IS TOO PRECIOUS FOR WHITE MEN TO EVER LAY A HAND ON THEM HE WOULD FOREVER REMAIN IN CONFINEMENT. MS. BINTER, WENT
ON TO STATE, WHAT THE PLAINTIFF NEEDED IS FOR A WHITE MAN TO DO IS TO GIVE HIM A GOOD OLDE ASS WHIPPING. WHEN
WHITE MEN BEAT BLACK MEN IT'S FOR THEIR OWN GOOD. . . SHE TAUNTED-N-MOCKED PLAINTIFF SEVERAL TIMES
CONCERNING THE ON-GOING THREATS TO ~~THE~~ HIS LIFE BY SCI-HUNTINGDON STAFF. AS LATE AS 2-27-2007, SHE VIA RE-
QUEST SLIP MOCKED PLAINTIFF BY IMPLYING THAT HE DO SOMETHING SCI-HUNTINGDON STAFF ARE CURRENTLY THREATEN-
ING TO ^{'KILL'} ~~HE~~ OR HAVE HIM ^{'KILLED'} ~~KILLED~~, IF HE DOES. THE COUNSELOR, KNEW ABOUT THESE ^{THREATS} ~~THREATS~~ IN ADVANCE.

49. ON 12-1-2006, RHQ LIEUTENANT: THOMAS HOLTZ + OFFICER: R. PROKOP; SANCTIONED A MISCONDUCT WRITTEN BY
OFFICER: R. PROKOP FOR PLAINTIFF NOT AGREEING TO ALLOW SCI-HUNTINGDON GUARDS TO PHYSICALLY BEAT HIM-UP, LT
HOLTZ, AND PROKOP, FOR THE PAST 10-MONTHS HAS THREATENED TO ^{'KILL'} ~~KILL~~ THE PLAINTIFF OR HAVE HIM ^{'KILLED'} ~~KILLED~~. THE
VERY SAME OFFICER PROKOP ON A DAILY BASIS IS CONSTANTLY THREATENING TO DO PLAINTIFF BODILY HARM, AND HE TAUNTS
-N-MOCK, AND DENY HIM A COMPLETE TRAY OF FOOD, AND BREAD, WHO'S THREATS BEGAN 1-30-2006, IS THE SAME R. PROKOP WHO DIRECTED
THE MISCONDUCT, WHICH WAS TANTAMOUNT TO PUNISHING PLAINTIFF BECAUSE HE DID NOT COMPLY TO DIRECT ORDER TO COM-
MIT 'SUICIDE'

50. TO DATE! SCI-HUNTINGDON ADMINISTRATION IS THREATENING TO DESTROY ALL OF PLAINTIFF'S LEGAL MATERIAL
AND EXHIBITS PERTAINING TO THREE ACTIVE CASES

51. ON 3-9-2007; 3-16-2007, + 3-30-2007; DR. KLEMICK RESPONDED TO PLAINTIFF'S REQUEST TO BE SEEN BY A CAR-
DIOLOGIST - EAR, NOSE AND ~~THROAT~~ THROAT SPECIALIST, AND SPECIALISTS FOR HIS MANY SERIOUS HEALTH PROBLEMS, BY TALKING
TO PLAINTIFF IN INSULTS -N- IN WORDS WITH RACIST OVERTONES. DR. KLEMICK VOWED TO PRESCRIBE A MEDICINE FOR
PLAINTIFF THAT WILL DEFINITELY ^{'DESTROY'} ~~DESTROY~~ HIS LIVER.

52. ON 4-5-2007, OFFICERS: KURTZ - SNYDER - SCOTT, UNDER THE GUISES OF TAKING PLAINTIFF TO A NEAR-BY PRISON FOR MEDICAL
REASONS. STARTING FROM THE MOMENT THEY CAME TO PLAINTIFF'S CELL DOOR UNTIL HE WAS RETURNED TO HIS CELL, DAB-3021,
THE THREE TOOK TURNS THREATENING HIM - SAYING ■ SEXUALLY PERVERTED THING TO HIM AND MAKING RACIST COM-
MENTS

53. ON 4-12-2007, DR. LONG, REFUSED TO HEAR PLAINTIFF'S MEDICAL COMPLAINTS, E.G. AT THAT TIME PLAINTIFF WAS EXPE-
RIENCING A DISCHARGE OF PUS-N-BLOOD; BUT PROCEEDED TO SCOLD PLAINTIFF; REFUSING TO GIVE ANY MEDICAL TREATMENT

54. DUE TO THE FREQUENT A THREAT TO THE ON-GOING THREATS TO PLAINTIFF'S LIFE BY SCI-HUNTINGDON STAFF MEMBERS TO ^{'KILL'} ~~KILL~~
THE PLAINTIFF OR HAVE PLAINTIFF ^{'KILLED'} ~~KILLED~~, DEMONSTRATED BY MAJOR: S. GLUNT - CPT KAUFFMAN - MAJOR: FISHER -
DEPUTY WARDEN - R. M. LADLER - LT. J. EWING - LT. JOHNSON - LT. WALTER - LT. THOMAS HOLTZ - LT. HARMAN - LT.

FOR MOST THE WARDEN: DAVID J. WAKEFIELD; CLEARLY DEMONSTRATES THAT THEY DEFINITELY DONOT HAVE PLAINTIFF'S
SAFETY - N - HEALTH IN THEIR INTEREST.

ALL OF THE FOREMENTIONED SCI-HUNTINGDON STAFF MEMBERS, INCLUDING DAZ, BLOCK OFFICER: B. BULTER, HAS
CAUSED - PERPETRATED - N - EXACERBATED THE RISK - N - HIGHTEN THE DANGER TO MY LIFE.

ALL OF THESE ISSUES WERE RAISED SEVERAL TIMES OVER TO THE WARDEN - WARDEN'S ASSISTANT - TWO DEPUTY WARDENS - TWO
UNIT MANAGERS - TWO COUNSELORS - THE HEALTH CARE ADMINISTRATOR - PSYCHOLOGIST - PSYCHIATRIC COORDINATOR - TWO PSYCHIATRISTS
THREE CHAPLAINS - TWO SECURITY CAPTAINS; TO DATE ALL RESPONSES HAVE BEEN VERY FLIPPANT, ~~THE WARDEN~~
YET TO TAKE THE APPROPRIATE SERIOUS ACTION TO PRODUCE MY 'SAFETY - N - HEALTH'. FOR THE WARDEN TO RE
FEAR THESE ISSUES TO SOMEONE IS A MARKED DEMONSTRATION THAT HE SIMPLY DO NOT! CARE IF I AM 'KILLED' BY
SCI-HUNTINGDON STAFF.

IF THIS COURT ALLOW ME REMAIN - OR - TO EVER BE RETURNED TO SCI-HUNTINGDON THEN THE COURT WILL HAVE
SANCTIONED - N - ENSURED MY DEATH BY SCI-HUNTINGDON STAFF MEMBERS, OR ORCHESTRATED BY SCI-HUNTINGDON STAFF
MEMBERS. THERE - AT - I AM NOT! SAFE! IN SCI-HUNTINGDON OR IN ANY - N - ALL PRISONS LOCATED IN NORTH-
CENTRAL - ~~WESTERN~~, PA THERE AND AFTER

I AM TERRIBLY 'AFRAID FOR MY LIFE' I BEG THIS COURT TO PLEASE HELP
ME! I SUBMIT TO THIS COURT THE FOLLOWING PLEAD FOR HELP. YES! SCI-HUNTINGDON STAFF
MEMBER WILL DEFINITELY HURT ME SEVERELY! THESE ARE THE FAMILY MEMBERS - FRIENDS - NEIGHBORS
WHO PERMANENTLY DAMAGED ME PHYSICALLY - N - MENTALLY SO, ANY - N - ALL CLAIMS TO THE CONTRARY MUST
FAIL WHEN IT'S FACT THEY HAVE DONE SO ALREADY.

TO DATE! I AM BEING THREATEN BY THE EXACT SAME SCI-HUNTINGDON STAFF MEMBERS ON A DAILY BASIS.

IN LIGHT OF THE FOREGOING SET OF FACTS I BEG THIS COURT TO PROCURE THE PLAINTIFF'S 'SAFETY -
N - HEALTH' BY IMMEDIATELY TRANSFERRING HIM TO SCI-CHESTER, OR SCI-GRATERFORD, ELSE I WILL DEFINITELY BE 'KIL
ED' OR MY DEATH CAUSED BY SCI-HUNTINGDON STAFF MEMBERS.

THESE ON - GOING THREATS HAVE MADE LIFE FOR PLAINTIFF A STATE OF CONTINUOUS NON STOP TERROR THIS IS
OVERT RACISM, AND IT'S BEING CONDUCTED SOLELY FOR RETALIATION. . . THIS IS A BLATANT VIOLATION OF PL
AINTIFF'S 8th AND 1st AMENDMENT RIGHTS VIA VOLUNTARY - N - DELIBERATE INDIFFERENCE.

ARGUMENT

POINT I:

PLAINTIFF IS ENTITLED TO A PERMANENT RESTRAINING ORDER AND A PRELIMINARY INJUNCTION

COURTS GENERALLY CONSIDER SEVERAL FACTORS: WHETHER THE PARTY WILL SUFFER IRREPARABLE INJURY, THE "BALANCE OF HARDSHIP" BETWEEN THE PARTIES, LIKELIHOOD OF SUCCESS ON THE MERITS, AND THE PUBLIC INTEREST. EACH OF THESE FACTORS FAVORS THE GRANTING OF THIS MOTION.

A. THE PLAINTIFF IS THREATENED WITH IRREPARABLE HARM/ACTUAL INJURY:

THE PLAINTIFF ALLEGES THAT HE HAS BEEN PLACED IN A SITUATION IF THE TRO/PRELIMINARY INJUNCTION IS NOT ISSUED ^{ALL} OF HIS LEGAL MATERIAL, DOCUMENTS-^N-EXHIBITS PERTAINING TO TWO ACTIVE CASES AND THE NEWLY FILED COMPLAINT, WHICH TOTALS TO THREE ACTIVE CASES, ONE PRESENTLY BEFORE THE THIRD CIRCUIT COURTS OF APPEAL WILL DEFINITELY BE 'DESTROYED'. PLAINTIFF WILL SUFFER A PERMANENT PHYSICAL HARM HEALTH-WISE, PERMANENT LOSS OF RELIGIOUS LITERATURE, AND HE WILL DEFINITELY BE 'KILLED' OR PLAINTIFF'S DEATH ORCHESTRATED BY SCE-HUNTINGDON STAFF MEMBERS, AND MORE SERIOUS THREATS ^N-RETALIATIONS ARE INEVITABLE.

SUCH CONDUCT BY PRISON OFFICIALS ARE A CLEAR VIOLATION OF THE 1st, 4th, 8th AND 14th AMENDMENTS, AND RLUIP AS A MATTER OF LAW, THE CONTINUING DEPRIVATION OF CONSTITUTIONAL RIGHTS CONSTITUTES IRREPARABLE HARM. BURNS, 427 U.S. 347, 373, 96 S. CT. 2673 (1976) ACTUAL INJURY. SEE LEWIS V. CASHY, 518 U.S. 343 (1996); OLIVER V. FRAUER, 118 F.3d 175, 177-78 (3rd CIR. 1997), BOWEN V. SMITH, 430 U.S. 817, 824, 828, 97 S. CT. 1791 (1977); SOC. INC. V. COUNTY OF CLARK, 152 F.3d 1134, 1148 (9th CIR 1998) (HOLDING THAT A CIVIL LIBERTIES ORGANIZATION THAT HAD DEMONSTRATED PROBABLE SUCCESS ON THE MERITS OF ITS FIRST AMENDMENT OVERBREADTH CLAIM HAD THEREBY ALSO DEMONSTRATED IRREPARABLE HARM), AND THE "RELIGIOUS LAND USE AND INSTITUTIONALIZED PERSONS ACT 2000" ("RLUIPA").

A PLAINTIFF SUFFERS IRREPARABLE INJURY WHEN THE COURT WOULD BE UNABLE TO GRANT AN EFFECTIVE MONETARY REMEDY AFTER A FULL TRIAL BECAUSE SUCH DAMAGES WOULD BE INADEQUATE OR DIFFICULT TO ASCERTAIN. SEE TRI-STATE GENERATION + TRANSMISSION ASSOC., INC. V. SHOSHONE RIVER POWER, INC., 874 F.2d 1341, 1354 (10th CIR. 1994).

PLAINTIFF CLAIMS HE WILL BE PERMANENTLY HARMED BECAUSE ANY REMEDY HELD BY THE COURT WILL NOT PROPERLY REDRESS PREVIOUS DENIALS ACCESS TO RELIGIOUS BOOKS AND WRITINGS, AND LEGAL DOCUMENTS. "WHEN AN ALLEGED CONSTITUTIONAL RIGHT IS DENIED, AND THE COURT HOLDS THAT NO FURTHER REMEDY OF IRREPARABLE HARM IS NECESSARY", SEE 11 A. CHARLES ALAN WRIGHT, ARTHUR R. MELLER + MARY KAY KANE, FEDER

- ALL PRACTICE AND PROCEEDINGS (2008) 10/12/07 SPAGE 30604 THAT A PLAINTIFF SATISFIES THE IRREPARABLE HARM ANALYSIS BY ALLEGING A VIOLATION OF RLUIPA. SEE JELLY V. CASHLIN, 74 F.3d 448, 452 (2ND CIR. 1994). ALTHOUGH THE PLAINTIFF'S FREE EXERCISE CLAIM IS STATUTORY RATHER CONSTITUTIONAL/ER BOTH STATUTORY AND CONSTITUTIONAL, THE DENIAL OF PLAINTIFF'S RIGHT TO FREE EXERCISE OF HIS RELIGIOUS BELIEFS IS A HARM THAT CANNOT BE ADEQUATELY COMPENSATED MONETARILY" SEE LEBLANC-STERBERG V. FLETCHER, 67 F.3d 412, 426 (3RD CIR. 1995); PAULSEN V. COUNTY OF NADEN, 915 F.2d 66, 68 (2ND CIR. 1991)
2. ATCHISON TOPEKA + SANTA FE RY. CO. V. LENNEN, 640 F.2d 253, 259 (10TH CIR. 1980) "WHEN EVIDENCE SHOWS THAT THE DEFENDANTS ARE ENGAGED OR ABOUT TO BE ENGAGED IN THE ACT OR PRACTICES PROHIBITED BY A STATUTE WHICH PROVIDES FOR INJUNCTIVE RELIEF TO PREVENT SUCH VIOLATIONS, IRREPARABLE HARM TO THE PLAINTIFF'S NEEDS, NEED NOT BE SHOWN". AND AS A
3. CHILDREN OF THE 'SUN' CHURCH FOLLOWER, THE PLAINTIFF FACE THE POSSIBILITY OF IRREPARABLE INJURY, ABSENT THE INSURANCE OF PRELIMINARY INJUNCTION, IN ACTION UNDER RELIGIOUS LAND USE AND INSTITUTIONALIZED PERSONS ACT (RLUIPA), PREVENTING THE PA DOC, SEE-HANTINGDON FROM GOING FORWARD ON ITS PROMISE TO DESTROY ALL OF PLAINTIFF'S RELIGIOUS BOOKS AND WRITTEN LITERATURE THAT ARE ALSO LEGAL EXHIBITS; AND DEFENDANTS' VIOLATION OF THEIR OWN POLICY DENYING PLAINTIFF ACCESS TO HIS RELIGIOUS BOOKS WHEREIN PLAINTIFF IS FORCED TO RE-GET HIS RELIGIOUS BELIEF, WHERE PLAINTIFF RELIGION MANDATES THAT HE READ "AFROCENTRIC" BOOKS, THE BOOKS SEE-HANTINGDON HAS DENIED THE PLAINTIFF FROM HIS OWN PROPERTY ARE "AFROKENTRIK" BOOKS. PLAINTIFF HAS SUFFERED AN IMMEDIATE AND NOT BLESS^{ABLE} DUE TO DEFENDANTS' ~~SEE~~ REFUSAL. THERE AND AT, PLAINTIFF RAISES A COLORABLE CLAIM THAT POLICY VIOLATED HIS FREE EXERCISE RIGHTS UNDER FIRST AMENDMENT. . . . A PARTY SEEKING PRELIMINARY INJUNCTIVE RELIEF IN A FIRST AMENDMENT CONTEXT CAN ESTABLISH IRREPARABLE INJURY SUFFICIENT TO MEET THE GRANT OF RELIEF BY DEMONSTRATING THE EXISTENCE OF A COLORABLE FIRST AMENDMENT CLAIM. . . . NIKE INC V. MCCARTHY, 379 F.3d 576, 580 (9TH CIR. 2000) (QUOTING GLENN V. P.G.A. TOUR INC., 936 F.2d 417, 422 (9TH CIR. 1997)) "THAT USE TWO ALTERNATIVES REPRESENT EXTREMES OF A SINGLE CONTINUUM, RATHER TWO SEPARATE TEST. THE GREATER THE RELATIVE HARDSHIP TO PLAINTIFF, THE HIGHER PROBABILITY OF SUCCESS MUST BE SHOWN, SEE WILCOX V. L. H. & S. CO., 198 F.3d 725, 731 (9TH CIR. 1999)
4. THE LOSS OF FIRST AMENDMENT FREEDOMS, FOR EVEN MINIMAL PERIODS OF TIME, CONSTITUTES IRREPARABLE INJURY FOR PURPOSES OF INSURANCE OF A PRELIMINARY INJUNCTION, ELKAD V. BURNS, 527 U.S. 347, 373, 94 S. CT. 2673 (1997)
5. IN ANY EVENT, IT IS THE ALLEGED VIOLATION OF A CONSTITUTIONAL RIGHT THAT TRIGGERS A FINDING OF

MO, 748 F.2d 804, 806 (1st Cir. 1984)

6. COURTS HAVE PERSUASIVELY FOUND THAT IRREPARABLE HARM ACCOMPANIES A SUBSTANTIAL BURDEN ON AN INDIVIDUAL'S RIGHTS TO FREE EXERCISE OF RELIGION UNDER RLUIPA. SEE, E.G., ALAMEEN, 892 F. SUPP. 447-48; LUCKETTE V. LEWIS, 883 F. SUPP. 471, 483 (D. ARIZ., 1995)

IN ADDITION, THE PLAINTIFF IS THREATENED WITH IRREPARABLE HARM AND ACTUAL INJURY, BECAUSE ONCE THESE DOCUMENTS AND EXHIBITS ARE DESTROYED, SOME BY INDIVIDUALS WHO ARE NOW DECEASED IT WILL BE IMPOSSIBLE TO REPLACE THEM. . . . NO ACCESS TO 'SPECIALISTS' FOR HEALTH, SEVERAL SERIOUS PROBLEMS ALL PA.DOC DOCTORS AND PACS, INCLUDING SCOTT HUNTINGDON'S HAVE DECLARED THEY CANNOT 'CURE OR CORRECT,' HILL V. DEKAB REG'L YOUTH DET. CTR., 40 F.3d 1174, 1187 (1st Cir. 1994); TAYLOR V. BLAMS, 221 F.3d 1254, 1258 (1st Cir. 2000), TILLEY V. OWENS, 711 F. SUPP. 1354, 1367 (W.D. PA. 1989); HENDEL V. EVANS, 92a F.2d 112, 123 (1st Cir. 1941); CASEY V. LEWIS, 834 F. SUPP. 1417, 1516 (D. ARIZ. 1995); INMATES OF OKLAHOMA V. GARY, 717 F. SUPP. 854, 867 (E.D.C. 1981); HELLING V. MCKINNEY, 509 U.S. 25, 113 S. CT. 2475, 2480 (1993), QUOTING DESHANEY V. WINNEBAGO COUNTY DEPT. OF SOCIAL SERVICES, 489 U.S. 189, 204, 109 S. CT. 998 (1989); ANCATA V. PRISON HEALTH SERVICES, INC., 769 F.2d 700, 704-05 (1st Cir. 1985) (REFUSAL TO PROVIDE SPECIALTY CONSULTATIONS WITHOUT A COURT ORDER); ESTELLE V. GAMBLE, 429 U.S. 97, 107 (1977) (INTENTIONALLY DENYING OR DELAYING ACCESS TO MEDICAL CARE); FARMER V. BRENNAN, 571 U.S. 825, 834 (1994) (INCARCERATED UNDER CONDITIONS POSING A RISK OF SERIOUS HARM), AND NO MEDICATIONS AND TREATMENT FOR CHRONIC LONG TERM HEALTH PROBLEMS, CURRENT ON-GOING THREATS BY PA.DOC STAFF MEMBERS, ARE BOUND TO LEAD TO IRREPARABLE AND INEVITABLE HARM, AND DEATH CAUSED OR ORCHESTRATED BY SCOTT HUNTINGDON STAFF.

B. THE BALANCE OF HARSHNESS FAVORS PLAINTIFF:

IN DECIDING WHETHER TO GRANT THE'S AND PERMANENTLY ENJOINED COURT HAS CHOICE AS TO WHETHER THE CHITAINS OF THE OTHER PARTY IF THE COURT IS DENIED WILL GO OUT WITH THE SUPPLIES ON THE NON MOVING PARTY IF THE COURT IS DENIED. SEE WILSON V. LANDOLT INC., 33 F.3d 712, 714-15 (10th Cir. 1994); CALIF-CALIF V. TROTTING & CO., INC., 670 F.3d 312, 314-15 (2nd Cir. 1982).

2. THE PLAIN V. CHALLEN & COMPANY, INC., 40 F.3d 37, 33-34 (2nd Cir. 1995) THE PLAINTIFF'S 'CLEAR OR SUBSTANTIAL' CHANCES OF A LIKELIHOOD OF SUCCESS WHERE (1) THE INJUNCTION SOUGHT 'WILL ALTER, RATHER THAN MAINTAIN, THE STATUS QUO' - I.E., ILLEGALLY CHARACTERIZED AS A 'MANDATORY' RATHER THAN 'PROHIBITORY'

LIGHT, AND THAT RELIEF CANNOT BE UNDONE EVEN IF THE DEFENDANTS PREVAIL AT A TRIAL ON THE MERITS.

3. HOWEVER, EVEN IF THE MERITS OF THE CONSTITUTIONAL CLAIM WERE NOT "CLEARLY ESTABLISHED" AT THE EARLY STAGES IN LITIGATION, THE FACT THAT A CHALLENGE TO A FIRST AMENDMENT QUESTION'S COMPEL A PERSON TO SPEAK THAT THERE EXISTS "THE POTENTIAL FOR TAKEPARABLE INJURY, OR THAT AT THE VERY LEAST THE BALANCE OF HARDSHIP TIPS SHARPLY IN PLAINTIFF-MOVANT'S FAVOR. VIA COM INT'L INC. V. FCI 828 F. SUPP 741, 744 (N.D. CA 1993)

4. A PARTY SEEKING PRELIMINARY INJUNCTIVE RELIEF IN A FIRST AMENDMENT CONTEXT CAN ESTABLISH TAKEPARABLE INJURY SUFFICIENT TO MERIT THE GRANT OF RELIEF BY DEMONSTRATING THE EXISTENCE OF A COLORABLE FIRST AMENDMENT CLAIM. ID. (CITING SAN DIEGO COMMITTEE V. GOVERNING BOARD, 790 F.2d 1471 (9th Cir. 1986) AND CAUSE THE TEST FOR GRANTING A PRELIMINARY INJUNCTION IS A CONTINUUM IN WHICH THE REQUIRED SHOWING OF HARM VARIES INVERSELY WITH THE REQUIRED SHOWING OF NECESSITIES, WHEN THE HARM CLAIMED IS A SERIOUS INFRINGEMENT ON CORE EXPRESSIVE FREEDOMS, A PLAINTIFF IS ENTITLED TO AN INJUNCTION EVEN ON A LESSER SHOWING OF NECESSITIES. SEE SAN DIEGO COMMITTEE, 790 F.2d AT 1473 N.1

5. WITHOUT THE GRANT OF THE INJUNCTION, PLAINTIFF WILL SUFFER THE PERMANENT LOSS OF LEGAL DOCUMENTS AND EXHIBITS PERTAINING TO 'THREE ACTIVE CASES', AND THE PERMANENT LOSS OF HIS 'AFRO KENTRIK' BOOKS AND WRITTEN LITERATURE, THE CONSEQUENT LOSS OF DIVINE BLESSINGS THAT CAN ONLY BE ATTAINED THROUGH THE STUDY OF 'AFRO KENTRIK BOOKS' AND WRITTEN LITERATURE, AND THE 'FORCED' ABANDONMENT OF HIS RELIGIOUS BELIEF. IF THE MOTION IS GRANTED DEFENDANTS WILL EXPERIENCE NO LOSS, THE FOREMENTIONED PROPERTY WILL REMAIN IN STORAGE, AS IS TO DATE! IF THE MOTION FOR THE INJUNCTION IS NOT GRANTED PLAINTIFF PHYSICAL HEALTH WILL CONTINUE TO VASTLY DETERIORATE CAUSING A VERY SLOW-N-PAINFUL DEATH. WITH THE GRANT DEFENDANTS WILL ONLY HAVE TO ALLOW PLAINTIFF TO BE SEEN-N-PROVIDED FOLLOW-UP MEDICAL TREATMENT BY MEDICAL SPECIALISTS. DEFENDANTS HAVING TO COMPLY TO A COURT ORDER PAID IN COMPENSATION TO THE LOSS OF HUMAN LIFE. IN LIGHT OF THE FOREGOING SET OF FACTS PLAINTIFF HAS DEMONSTRATED THAT HE WOULD IN DEED SUFFER A LOSS BEYOND ALL RECOVERY, THEREFORE, PLAINTIFF WOULD EXPERIENCE ~~IRREPARABLE~~ IRREPARABLE HARM IF THE PRELIMINARY INJUNCTION IS DENIED, AND THAT THIS HARM IS MUCH MORE SERIOUS THAN THE HARDSHIP ~~THE~~ THE PLAINTIFF ~~PLAINTIFF~~ ~~HAS~~ ~~WILL~~ HAVE A CHANCE OF RECOVERY IF THE INJUNCTION WERE GRANTED, SEE EDDEL V CITY OF CLEVELAND, 107 F.2d 346, 343 (9th Cir. 1937), MITCHELL V CUOMO, 748 F.2d 804, 806 (1st Cir. 1987) (HOLDING THAT DANGERS POSED BY PRISON CROWDING OUTWEIGHED STATE'S FINANCIAL ADMINISTRATIVE CONCERN) DUGAN V. ANAZA, 672 F.2d 510, 517 (N.M. 1982). HOLDING THAT PRISONER'S INTEREST IN SAFETY AND MEDICAL

IN THIS CASE, THE PRESENT SUFFERING OF THE PLAINTIFF IS AT THE CORE OF OUR COUNTRY'S GREATEST LIBERTIES, RELIGIOUS LIBERTY, ACCESS TO THE COURTS AND ACCESS TO SERIOUS MEDICAL TREATMENT ARE CONSTITUTIONAL VALUES OF THE HIGHEST ORDER AND FRAMERS OF THE CONSTITUTION INCLUDED PROTECTION FOR THE FREE ACCESS TO THE COURTS, THE EXERCISE OF RELIGION, AND SERIOUS MEDICAL TREATMENT IN THE FIRST AND FOURTH, FIFTH AND FOURTEENTH AMENDMENTS. THE SUFFERING THE DEFENDANTS WILL EXPERIENCE IF THE COURT GRANTS THE ORDER WILL CONSIST OF STORING THE LEGAL MATERIAL AND LEGAL EXHIBITS, AND AFFORD PLAINTIFF THE ACCESS TO 'SPECIALISTS'. DEFENDANTS ARE LOSING THEM AT THIS TIME PART WITH NO DIFFICULTY AT ALL. THEREFORE, IF THE COURT GRANTS THE MOTION IT WILL NOT CAUSE DEFENDANTS ANY CHANGE AT ALL.

C. THE PLAINTIFF IS LIKELY TO SUCCEED ON THE MERITS:

THE PLAINTIFF HAS A GREAT LIKELIHOOD OF SUCCEED ON THE MERITS.

THE LEGAL MATERIAL AND LEGAL EXHIBITS AT ISSUE PERTAIN TO THREE ACTIVE CASES: TWO CIVIL, AND A CRIMINAL CASE. THE TWO CIVIL CASES, WASHINGTON V. KELM, NO. 03-2351, & WASHINGTON V. WAKEFIELD, AND THEIR LEGAL EXHIBITS ARE PERTAINING TO 'RLUIPA'. THE COURT'S DECISION IN CUTLER V. WILKINSON, 544 U.S. 125 S. CT 2113 (2005) ESTABLISHED THE CONSTITUTIONALITY OF RLUIPA. AND RLUIPA MANDATES THE USE OF THE 'LEAST RESTRICTIVE MEANS' TO ACHIEVE THEIR STATE INTEREST AS WELL AS THE FACTS THAT PLAINTIFF HAVENS: MEET THE CRITERIA SET BY THE PA DOC OWN! POLICY, DC-ADM 815; 803-802-801; WHICH ADDRESS THE AMOUNT OF PROPERTY AN INMATE IS PERMITTED TO OWN. PURSUANT TO POLICIES: PLAINTIFF WARRANTS THE APPROVAL FOR EXCESS BOXES OF LEGAL MATERIAL AND EXHIBITS, AND ACCESS TO RELIGIOUS BOOKS AND RELIGIOUS LITERATURE.

1. ASHCROFT V. AMERICAN CIVIL LIBERTIES UNION, 542 U.S. 656, 124 S. CT 2783, 159 L. ED 2d 690 (2004). IN ASHCROFT, THE COURT AFFIRMED THE GRANT OF A PRELIMINARY INJUNCTION IN A CASE WHERE THE GOVERNMENT HAD FAILED TO SHOW A LIKELIHOOD OF SUCCESS UNDER THE COMPELLING INTEREST. THE COURT REASONED THAT, "AS THE GOVERNMENT BEARS THE BURDEN OF PROOF ON THE ULTIMATE QUESTION OF THE CHALLENGED ACT'S CONSTITUTIONALITY, THE MOVANT MUST BE DEEMED LIKELY TO PREVAIL UNLESS THE GOVERNMENT HAS SHOWN THAT THE NON-MOVANTS PROPOSED LESS RESTRICTIVE ALTERNATIVES LESS RESTRICTIVE THAN ENFORCING THE ACT" ID. AT 696, 124 S. CT. 2783. . . . THE LOGIC EXTENDS TO THIS CASE, WHERE EVEN AT THE PRELIMINARY INJUNCTION STAGE UNTIL THROUGHOUT THE TRIAL THE POINT REMAINS GOVERNMENT BURDEN, SEE ID. AT 695, 124 S. CT. 2783. BUT IN NO WAY DID THIS AFFECT COURT'S ASSESSMENT OF THE CONSEQUENCES OF THE GOVERNMENT HAVING THAT BURDEN FOR THE PRELIMINARY INJUNCTION. HERE

2. HERE THE BURDEN IS PLACED PROPERLY ON THE GOVERNMENT, RATHER THAN THE FIRST AMENDMENT. SEE 42 U.S.C. 2000cc 1-5, BUT THE CONSEQUENCES ARE THE SAME. CONGRESS' EXPRESSED DECISION TO LEGISLATE THE "LEAST RESTRICTIVE MEANS" TEST INDICATES THAT RLUIPA CHALLENGES SHOULD BE ADJUDICATED IN THE SAME MANNER AS CONSTITUTIONALLY MANDATED APPLICATION TO THE TEST, INCLUDING AT THE PRELIMINARY INJUNCTION STAGE. SEE GONZALES V. O CENTRO ESP BENEF UNIAO DO VEGE _____ U.S. _____, _____, 126 S. CT 1211, 1219 (2004)

3. RELIGIOUS LAND USE AND INSTITUTIONALIZED PERSONS ACT OF 2000 (RLUIPA)

RLUIPA PROVIDES IN PERTINENT PART:

(A) IN GENERAL

GOVERNMENT SHALL NOT SUBSTANTIALLY BURDEN A PERSON'S EXERCISE OF RELIGION EVEN IF THE BURDEN RESULTS FROM A RULE OF GENERAL APPLICABILITY, EXCEPT AS PROVIDED IN SUBSECTION (B) OF THIS SECTION.

(B) EXCEPTION

GOVERNMENT MAY SUBSTANTIALLY BURDEN A PERSON'S EXERCISE OF RELIGION ONLY IF IT DEMONSTRATES THAT APPLICATION OF THE BURDEN TO THE PERSON —

(1) IS IN FURTHERANCE OF A COMPELLING GOVERNMENT INTEREST; AND

(2) IS THE LEAST RESTRICTIVE MEANS OF FURTHERING THAT COMPELLING GOVERNMENT INTEREST.

4. THE CONTINUING DEPRIVATION OF CONSTITUTIONAL RIGHTS CONSTITUTES "IRREPARABLE INJURY/ACTUAL INJURY". ELROD V BURNS, 427 U.S. 347, 373, 94 S. CT. 2673 (1976). THIS PRINCIPLE HAS BEEN APPLIED IN PRISON LITIGATION GENERALLY, SEE: NEWSOME V. NORRIS, 888 F.2d 371, 378 (6th CIR. 1984); MITCHELL V. QUOMO, 749 F.2d 804, 806 (2nd CIR. 1984); ALBRO V. COUNTY OF ONONDAGA, N.Y., 627 F.S. 1280, 1287 (N.D. N.Y. 1980); WILLIAMS V. LANE, 646 F.S. 1409 (N.D. ILL. 1980) AFF'D 851 F.2d 811 (7th CIR. 1983), CERT. DEN 109 S. CT. 279 (1989)

IN LIGHT OF THE FOREGOING SET OF FACTS, NOT TO GRANT THE MOTION WOULD BE TANTAMOUNT TO DENYING PLAINTIFF HIS CONSTITUTIONAL RIGHT OF RELIGIOUS EXERCISE, ACCESS TO THE COURT, SERIOUS MEDICAL TREATMENT, AND RLUIPA, THE SPECIFIC EXPRESSION OF CONGRESS, THE ONE HUNDRED SIXTH CONGRESS OF THE UNITED STATES OF AMERICA

5. ADDITIONALLY, TO DATE, PLAINTIFF IS IN PERFECT COMPLIANCE TO PA. DOC POLICIES, WHERE THE CONFLICT BEGAN WHEN DEFENDANTS SOLELY FOR THE SAKE OF RETALIATIONS, "DENYING PLAINTIFF THE APPROVAL FOR EXCESS BOXES OF LEGAL MATERIAL", AFTER PLAINTIFF HAVING ALREADY SEVERAL TIMES OVER ASPECT THE PA DOC. DOWN POLICIES, PURSUANT TO DC-FILEM-8/5; DC-ADM 803; DC-ADM-802; DC-ADM 801; YET DEFENDANTS DENIED PLAINTIFF ACCESS TO 'SPECIALISTS', AND MEDICATIONS - IN TREATMENT FOR LONG

VALVANO V. McGRATH, 325 F. SUPP. 408 (E.D. N.Y. 1970); AL-JUNDI V. MANCINI, 113 F. SUPP. 2d 441, 443, 453 (W.D. N.Y. 2000); ATTICA V. ROCKEFELLER, 352 F.2d 12, 14 (3rd CIR. 1971); GILMORE V. LYNCH, 319 F.S. 105 (N.D. CAL. 1970); BAAR V. TELFORD, 677 F.S. 318 (N.D. ILL. 1964); BART V. TELFORD, 677 F.2d 622 (7th CIR. 1982); THADDEUS-X V. BLATTER, 175 F.3d 378, 401 (6th CIR. 1999). . . . SUCH PUNITIVE ACTIONS ARE BEING

CONDUCTED SOLELY FOR THE SAKE OF "RETALIATIONS", MOTIVATED BY RACISM, WHEREBY PLAINTIFF IS SPECIFICALLY TARGETED WITH THE GOAL OF CAUSING PLAINTIFF'S CIVIL ACTION, WASHINGTON V. KLEA, NO. 05-2351, WASHINGTON V. WAKEFIELD, AND CRIMINAL CASE, WASHINGTON V. COMMONWEALTH OF PENNSYLVANIA,

TO FAIL OR TO BECOME MOOT! . . . DEFENDANTS MOTIVATE FOR DOING SO WOULD MAKE A DECISION BY THE COURTS IN THE CIVIL CASE IN THE PLAINTIFF'S FAVOR TO BE MEANINGLESS! COURTS HAVE ISSUED

A TRO IN THE PAST TO STOP SUCH ACTION, GILMORE V. LYNCH, 319 F.S. 105 (N.D. CAL. 1970) AFF'D SUB NOM YONGER V. GILMORE, 404 U.S. 15 (1971). THIS WOULD BE TANTAMOUNT TO DEFENDANTS HAVING SUCCESSFULLY DENIED PLAINTIFF'S 1ST-4TH-8TH AND 14TH AMENDMENT RIGHTS, AND RUIN, 'PERMANENTLY'

6. CUTTER V. WILKINSON, 544 U.S. 709, 125 S.Ct. 213 (2005) "EVERY STATE", INCLUDING PENNSYLVANIA, ACCEPTS FEDERAL FUNDING FOR ITS PRISONS. BRIEF FOR UNITED STATES 23, N.16 (CITING FY 2003 OFFICE OF JUSTICE PROGRAMS & OFFICE OF COMMUNITY ORIENTED POLICE SERVICES GRANTS BY STATE) ID 544 AT NOTE #4, THEREFORE ■ DEFENDANTS ARE COMPELLED TO COMPLY TO THE MANDATES OF RUIN, "LEAST RESTRICTIVE MEANS"

7. AFFIRMATIVE ORDER: EACH-N-EVERY TIME PLAINTIFF HAS FILED A MOTION, OR LITIGATION WITH THE COURT, SUBMITTED A REQUEST STOP TO SCI-HUNTINGDON ADMINISTRATION, OR A LETTER TO A 'BLACK PUBLIC' FIGURE HE HAS BEEN SYSTEMATICALLY RETALIATED AGAINST FOR DOING SO. . . . CONSIDERING THE FACT ONE OF THE DEFENDANTS, SCI-HUNTINGDON PAC, MRS. D. WELLS, HAS A HUSBAND, AND A BROTHER-IN-LAW, ALL THREE ARE DEFENDANTS WORK ASSIGNMENT ARE THROUGHOUT THIS PRISON, THEN-N-THERE IS DEFINITELY 'INEVITABLE' - THAT PLAINTIFF WILL THE VICTIM OF A VAST RETALIATION THIS PLACES PLAINTIFF'S LIFE IN EXTREME DANGER OF BEING 'SERIOUSLY INJURED', LEAVING THE PLAINTIFF PERMANENTLY AFFECTED PHYSICALLY-N-PSYCHOLOGICALLY. SEE: HELLIN V. MCKINNEY, 509 U.S. 25, 35 (1993); FORMER V. BRENNAN, 511 U.S. 825, 847 (1994) BEERS-CAPITOL V. WETZEL, 256 F.3d 120, 138 (3rd CIR. 2001). THIS IS NEVER! GOING TO STOP! THERE AND IN PLAINTIFF IS NOT! IN SCI-HUNTINGDON, OR IN ANY-N-ALL PRISONS LOCATED IN NORTHERN-CENTRAL-WESTERN, PA. . . . THE PLAINTIFF IS DEFINITELY GOING TO BE 'KILLED' BY, OR HIS DEATH ORCHESTRATED BY SCI-HUNTINGDON STAFF I AM VIOLENTLY 'AFRAID' FOR MY LIFE; SEE ATTICA V. ROCKEFELLER, 453 F.2d 12, 14 (3rd CIR. 1971); LAWMAN V. ROYSTER, 333 F.S. 621, 656 (E.A. VA. 1971) SOSTRE V. MCGINNIS, 442 F.2d 177-8, 207 (and CIR. 1971)

WHILE AT TIMES IRREPARABLE INJURY HAS BEEN SUBSUMED INTO THE BALANCE OF THE
HARD SHIPS FOR THE SAKE OF EXAMINING THE PUBLIC INTEREST IN DETERMINING THE APPROPRIATENESS OF A PRELIMINARY IN
JUNCTION; e.g. GART KEBAN MARINE SERVICES CO. V. BALDRICE, 844 F.2d 668, 674 (9th CIR. 1988). IT IS BETTER SEE
AS A ELEMENT THAT DESERVE SEPARATE ATTENTION WHERE THE PUBLIC INTEREST MAY BE AFFECTED, SEE FUND FOR ANIMALS V.
LUSAN, 918 F.2d 1391, 1400 (9th CIR. 1994), WESTLAND WATER DIST. V. NATURAL RESOURCES DEFENSE COUNCIL, 43 F.3d
457, 459 (9th CIR. 1994) (IF THE PUBLIC INTEREST IS INVOLVED, THE DISTRICT COURT MUST ALSO DETERMINE WHETHER THE P
LIC INTEREST FAVORS THE MOVANT") THE PUBLIC INTEREST INQUIRY PRIMARILY ADDRESS IMPACT ON NON-PARTIES ^{RATHER THAN} ~~THE~~ PAR
TIES. COURTS CONSIDERING A REQUEST FOR PRELIMINARY INJUNCTION HAVE CONSISTENTLY RECOGNIZED THE SIGNIFICANT PUBLIC
INTEREST IN UPHOLDING FIRST AMENDMENT PRINCIPLES. SEE, HOMMANS V. ALBUQUERQUE, 210 F.3d 1240, 1244 (10th
CIR. 2001) ("WE BELIEVE THAT THE PUBLIC INTEREST IS BETTER SERVED BY FOLLOWING BINDING SUPREME COURT PRECEDENT IN
PROTECTING THE CORE FIRST AMENDMENT RIGHT OF POLITICAL EXPRESSION"); IOWA RIGHT TO LIFE COMMITTEE, INC. V. WILL
IEHLB, 137 F.3d 943, 970 (8th CIR. 1999) (FINDING A DISTRICT COURT DID NOT ABUSE ITS DISCRETION IN GRANTING
A PRELIMINARY INJUNCTION "BECAUSE THE POTENTIAL HARM TO INDEPENDANT EXPRESSION AND CERTAINTY IN PUBLIC DISCUS
ION OF ISSUES IS GREAT AND THE PUBLIC INTEREST FAVORS PROTECTING CORE FIRST AMENDMENT FREEDOMS") SUSTER V. MARSHALL,
141 F.3d 532, 530 (6th CIR. 1998) (HOLDING CANDIDATES FOR JUDICIAL OFFICE WERE ENTITLED TO PRELIMINARY INJUNCTIONS OF
EXPENSIVE LITIGATION ~~IF~~ LIKE LIHOOD OF SUCCESS ON THE MERITS, IRREPARABLE HARM AND LACK OF PUBLIC INTEREST IN EN
FORCING A LAW THAT CURTAILED POLITICAL SPEECH") ELIANT CONSTR. INC. V. REGIONAL TRANSP. DIST., 129 F.3d 1342, 1347 (10th
CIR. 1997) (STATING, IN CONTEXT OF A REQUEST FOR INJUNCTION, THAT "THE PUBLIC INTEREST . . . FAVORS PLAINTIFFS'
ADDITION OF THEIR FIRST AMENDMENT RIGHTS") 341V LOUNGE, INC. V. MICH. LIQUOR CONTROL COMMISSION, 23 F.3d
1071, 1079 (6th CIR. 1994) (NOTING, IT IS ALWAYS ^{IN THE} ~~THE~~ PUBLIC INTEREST TO PREVENT THE VIOLATION OF A PARTY'S CONSTITU
TIONAL RIGHTS"); CATE V. OLDHAM, 707 F.2d 1176, 1190 (1st CIR. 1983) (HOLDING THE "STRONG PUBLIC INTEREST IN PROTECT
ING FIRST AMENDMENT VALUES" FAVORED PRELIMINARY INJUNCTIVE RELIEF). THE ONAGINE ENFORCEMENT OF THE PATENT-
^{IN SC-HUNTEN-DO}ALLY UNCONSTITUTIONAL REGULATIONS ~~WOULD INFRINGE~~ ^{WOULD INFRINGE} NOT ONLY THE FREE EXPRESSION INTEREST OF
ALL AMERICANS,
~~IN THIS CASE~~ IN THIS CASE, BUT ALSO THE INTERESTS OF OTHER PEOPLE WHO ~~WOULD~~ ENTER THE COMPLEX PA. DOC.
THE INSTANCE CASE, THE GRANT OF RELIEF WILL SERVE THE PUBLIC INTEREST BECAUSE IT IS ALWAYS IN THE PUBLIC INTER
EST OF THE NATION TO OBEY THE LAW, UNION V. FEDERAL, 174 F.2d 510, 511 (D. N.M. 1948) ("RESPECT FOR LAW, PARTICULARLY BY
OFFICIALS RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE'S CORRECTIONAL SYSTEM, IN ITSELF IS A MATTER OF THE
"HIGHEST PUBLIC INTEREST") SEE ALSO TEDELL V. OAKLAND COUNTY PROBATION OFFIC,
13 F.3d 1377, 1313 (E.D. MICH. 1995) ("THE CONTRIBUTION TO THE ULTIMATE EXPRESSION OF THE PUBLIC INTEREST")

POINT: II

THE PLAINTIFF SHOULD NOT BE REQUIRED TO POST SECURITY:

USUALLY A LITIGANT WHO OBTAINS INTERIM INJUNCTIVE RELIEF IS ASKED TO POST SECURITY, FRCP 65 (C) HOWEVER, THE PLAINTIFF IS AN IMPRISONED PRISONER AND IS UNABLE TO POST SECURITY, THE COURT HAS DISCRETION TO EXCLUDE AN IMPRISONED LITIGANT FROM SECURITY. ORANTES-HERNANDEZ V. SMITH, 541 F.S. 351, 358 N. 30 (C.D. CAL. 1982); J. L. V. PARHAM, 412 F.S. 113, 140 (D. CA. 1976), REV'D ON OTHER GROUNDS, 442 U.S. 584, 99 S. CT. 2493 (1979), IN VIEW OF THE SERIOUS CONSTITUTIONAL ISSUE AND THE PLETHORA OF LEGAL REASONING BACKING PLAINTIFF'S CLAIM THE COURT SHOULD GRANT THE RELIEF REQUESTED WITHOUT THE POSTING OF SECURITY.

CONCLUSION

IN LIGHT OF THE FOREGOING SET OF FACTS THE COURT SHOULD GRANT THE RELIEF OF THE MOTION IN ITS ENTIRETY.

DATED: 5-3-2007

"RESPECTFULLY SUBMITTED"
S/Henry Arnold Washington

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ANY-ALL FACTS, AND DR. POMEROY DR. HARRIS - FILE NO. 111071, PAGE 38 OF 41
ACCESS TO 'SPECIALISTS' AND SERIOUS MEDICAL TREATMENT AND ULTIMATELY A PRELIMINARY IN-
JUNCTION

7. FOR THE FOREGOING SET OF FACTS, THE COURT SHOULD GRANT THE PLAINTIFF'S MOTION IN 'ALL' RE-
SPECTS

PURSUANT TO 28 U.S.C. 1746, I DECLARE UNDER THE PENALTY OF PERJURY THAT
THE FOREGOING IS TRUE AND CORRECT.

DATED: 5-3-2007

"ONE-IN-HIM"
S/ Henry Winsold Harrington

FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

HENRY UNSELD WASHINGTON
PLAINTIFF

V

JAMES L. GRACE, DAVID T. WAKEFIELD, DOMINA VARNER,
MELVIN S. LOCKETT, R. M. LANIER, HARRY WILSON,
LINDA D. HARRIS, MARK KAYSEVES, CAROL SCOR,
S. GLUNT{ DECLARATION IN SUPPORT OF
{ PLAINTIFF'S{ MOTION FOR A TEMPORARY RESTRAINING ORDER
{ AND PRELIMINARY INJUNCTION

CASE NO. _____

HENRY UNSELD WASHINGTON DECLARES UNDER PENALTY OF PERJURY:

1. I AM THE PLAINTIFF IN THIS CASE. I MADE THIS DECLARATION IN SUPPORT OF MY MOTION FOR A TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION TO PREVENT DEFENDANTS FROM DESTROYING LEGAL DOCUMENTS AND EXHIBITS PERTAINING ~~THE~~ THREE ACTIVE CASES, WASHINGTON V. KLEM, NO. 05. 236, WASHINGTON V. JAMES L. GRACE, AND A CRIMINAL CASE, WASHINGTON V. COMMONWEALTH OF PENNSYLVANIA, AND RELIGIOUS LITERATURE
2. THE DENIAL OF ACCESS TO 'SPECIALISTS' AND SERIOUS MEDICAL TREATMENT, AND CURRENT ON-GOING THREATS BY SCI-HUNTINGDON STAFF
3. AS SET FORTH IN WASHINGTON V. KLEM, NO. 05. 236, PLAINTIFF IS BEING DENIED ACCESS TO THE COURT, RELIGIOUS RIGHTS, AND RELIGIOUS LAND USE AND ~~INSTITUTION~~ INSTITUTIONALIZED PERSON ACT OF 2000 ('RLUPA')
4. PLAINTIFF'S 1st, 4th, 8th AND 14th AMENDMENT RIGHTS ARE BEING VIOLATED
5. DEFENDANTS: DR. KLEMICK - DR. ROMERO - DR. BRANEDA - PAC, MS. MILLS AND HEALTH CARE ADMINISTRATOR A. L. SHAWALTER ARE RESPONSIBLE FOR PROVIDING 'SERIOUS MEDICAL TREATMENT' AND ACCESS TO 'SPECIALISTS'
6. FOR REASONS SET FORTH IN THE MEMORANDUM OF LAW FILED WITH THIS MOTION, THE PLAINTIFF IS ENTITLED TO A TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION REQUIRING SCI-HUNTINGDON WARDEN DAVID T. WAKEFIELD DO NOT! DESTROY PLAINTIFF'S LEGAL MATERIAL AND LEGAL EXHIBITS, AND RELIGIOUS LITERATURE, AND STOP DENYING PLAINTIFF ACCESS TO HIS RELIGIOUS BOOKS; AND PUT AN IMMEDIATE STOP TO THE THREATS, TAUNTING - MOCKING, AND RETALIATIONS IN

FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

HENRY UNSELD WASHINGTON
PLAINTIFF

V.

JAMES L. GRACE, DAVID J. WAKEFIELD, DORINA VARNER,
MELVIN S. LOCKETT, R.M. LAWLER, HARRY WILSON, LINDA D.
HARRIS, MARK KRYSEVIC, CAROL SCIRE, S. GLUNT

ORDER TO SHOW CAUSE
FOR A TEMPORARY RESTRAINING
ORDER AND PRELIMINARY INJUNCTION
CASE NO. _____

ORDER TO SHOW CAUSE AND TEMPORARY RESTRAINING ORDER:

UPON THE SUPPORTING AFFIDAVIT OF THE PLAINTIFF AND THE ACCOMPANYING MEMORANDUM OF LAW, IT IS

ORDERED THAT ALL DEFENDANTS, JAMES L. GRACE, M. L. SHAWALTER, DAVID J. WAKEFIELD, DORINA VARNER,

MELVIN S. LOCKETT, R.M. LAWLER, HARRY WILSON, LINDA D. HARRIS, MARK KRYSEVIC, CAROL SCIRE, S. GLUNT,

AND ALL REMAINING SCI-HUNTINGDON, AND SCI-FAYETTE STAFF MEMBERS WHO ARE CITED AS DE

FENDANTS IN THE ATTACHED 42 U.S.C. 1983 CIVIL RIGHTS COMPLAINT, WASHINGTON V. JAMES L. GR

ACE, SHOW CAUSE IN ROOM _____ OF THE UNITED STATES COURTHOUSE, 235 NORTH WASHINGTON

AVE., SCRANTON, PA 18501, ON THE _____ DAY OF _____, 2007, AT _____ O'CLOCK, WHY A PRE

ELIMINARY INJUNCTION SHOULD NOT BE ISSUED PURSUANT TO RULE 65 (A), FRCP ENJOINING THE SAID

DEFENDANTS, THEIR SUCCESSORS IN OFFICE, AGENTS AND EMPLOYEES AND ALL OTHER PERSONS ACTING IN CON

CERT AND PARTICIPATION WITH THEM, TO NOT! DESTROY PLAINTIFF'S LEGAL MATERIAL AND LEGAL EXHIB

ITS PERTAINING TO THREE ACTIVE CASES, WASHINGTON V. KLEM, AND THE INSTANCE, WASHINGTON V. JAM

ES L. GRACE, AND WASHINGTON V. COMMONWEALTH OF PENNSYLVANIA, AND TO NOT! DENY PLAINTIFF ACC-

CESS TO 'SPECIALISTS' AND SERIOUS MEDICAL TREATMENT; ACCESS TO RELIGIOUS BOOKS, AND TO THE COURT,

AND TO NOT! THREATEN-MOCK-TAUNT-N-RETALIATE AGAINST PLAINTIFF IN ANY-WAY

IT IS FURTHER ORDERED THAT EFFECTIVE IMMEDIATELY, AND PENDING THE HEARING AND DETERMINATION OF THE

ORDER TO SHOW CAUSE, DEFENDANTS: JAMES L. GRACE, DAVID J. WAKEFIELD, DORINA VARNER, M. L.

SHAWALTER, MELVIN S. LOCKETT, R.M. LAWLER, HARRY WILSON, LINDA D. HARRIS, MARK KRYSEVIC, CAROL SCIRE,

S. GLUNT, AND EVERY REMAINING SCI-HUNTINGDON STAFF MEMBER CITED AS DEFENDANTS IN WASHING-

TON V. JAMES L. GRACE, SHALL IMMEDIATELY-N-PROMPTLY PROCURE PLAINTIFF'S ACCESS TO THE COURTS,

"SPECIALISTS"-N-SERIOUS MEDICAL TREATMENT-TO RELIGIOUS BOOKS, AND IMMEDIATE 'SEPARATION FROM 'ALL'

SCI-HUNTINGDON STAFF MEMBERS AND ALL PA. DOC STAFF MEMBERS OF ANY-N-ALL PRISONS LOCATED IN NORTH

ERN-CENTRAL-WESTERN, PA., VIA AN IMMEDIATE TRANSFER TO A PRISON LOCATED 'OUTSIDE' - [REDACTED]
[REDACTED] OF NORTHERN-CENTRAL-WESTERN, PA., AND 'ALL' OF PLAINTIFF'S PROPERTY IS IMMEDIATELY [REDACTED] SHIPPED TO THE
EXACT SAME FACILITY PLAINTIFF IS TRANSFERRED TO.

IT IS FURTHER ORDERED THAT THIS ORDER TO SHOW CAUSE, AND ALL OTHER PAPERS ATTACHED TO THIS APPLICATION, SHALL BE SERVED ON DEFENDANTS: JAMES L. GRACE, M.L. SHOWALTER, DAVID J. WAKEFIELD, DORINA VARNER, MELVIN S. LOCKET, R.M. LAWLER, HARRY WILSON, LINDA D. HARRIS, MARK K. SEVIG, CAROL SCIRE, S. SLUNT, AND EVERY REMAINING SCI-HUNTINGDON AND SCI-FAYETTE STAFF MEMBER WHO ARE CITED AS DEFENDANTS IN THE ACCOMPANIED 42 U.S.C. 1983 CIVIL RIGHTS COMPLAINT: WASHINGTON V. JAMES L. GRACE, BY _____ 2007, AND THE UNITED STATES MARSHALLS SERVICES IS HEREBY ORDERED/DIRECTED TO EFFECTUATE SUCH SERVICE.

S/
UNITED STATES DISTRICT COURT JUDGE

DATED:

COUNTY OF HUNTINGDON

SWORN DECLARATION

I, HENRY UNSELD WASHINGTON, PURSUANT TO TITLE 28 U.S.C. SECTION 1741,
DECLARED UNDER THE PENALTY OF PERJURY:

THAT PLAINTIFF'S 1ST, 4TH, 8TH AND 17TH AMENDMENT IS BLATANTLY BEING VIOLATED CONTINUOUSLY ON A DAILY BASIS. THEREIN-HEREOFORWARD PLAINTIFF'S SUBJECT OF HIS FIRST AMENDMENT CLAIMS ARE DECLARED BY DEFENDANTS, SCHEDULED TO BE DESTROYED IN THE NEAR FUTURE; AND DUE TO ~~THE~~ CURRENT ON-GOING THREATS AND RETALIATIONS BY PA DOC STAFF MEMBERS, AND SCI-HUNTINGDON STAFF MEMBERS, AND THE CONTINUOUS PAIN-IN-SICKNESS PLAINTIFF IS BEING FORCED TO ENDURE, HIS CONTINUOUS FAILING HEALTH, ~~THE~~ DEFENDANTS DENIAL OF ACCESS TO SERIOUS MEDICAL TREATMENT, AND TO 'SPECIALISTS'; AND THE DEFENDANTS DENIAL OF ~~THE~~ ACCESS TO RELIGIOUS BOOKS. PLAINTIFF FURTHER STATES THAT ONCE ALL OF HIS LEGAL MATERIAL AND LEGAL EXHIBITS HAS BEEN DESTROYED THERE IS 'ABSOLUTELY NOWAY!' TO REPLACE THEM BECAUSE THE PEOPLE WHO SIGNED THESE DOCUMENTS ARE NOW 'DECEASED', THEREFORE, THE TRO/PRELIMINARY INJUNCTION IS THE PLAINTIFF'S ONLY! AVENUE TO PROTECT THE SAFETY OF HIS LEGAL MATERIAL AND LEGAL EXHIBIT, AND TO GAIN ACCESS TO SERIOUS MEDICAL TREATMENT-IN- 'SPECIALISTS', AND TO HIS RELIGIOUS BOOK, WHICH IS A VIOLATION OF RLUEPA; AND TO END THE 'CURRENT' ON-GOING THREATS BY SCI-HUNTINGDON STAFF TO PLAINTIFF'S LIFE, PLUS THE NON-STOP MOCKING-TAUNTING-AND RETALIATIONS

"RESPECTFULLY SUBMITTED"

S/ Henry Unsel Washington

HENRY UNSELD WASHINGTON
AM 3086

1100 PIKE ST.

HUNTINGDON, PA 16654-1112

PRO SE

DATED: 5-3-2007

FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

HENRY UNSELD WASHINGTON
PLAINTIFF

V.

JAMES L. GRACE, DAVID J. WAKEFIELD, DORENA VARNER,
MELVEN LOCKETT, R. M. LAWLER, HARRY WILSON, LINDA
HARRIS, MARK KRYSEVIG, CAROL SCIRE, S. GLINT

PROOF OF SERVICE

I, HENRY UNSELD WASHINGTON, PLAINTIFF, HEREBY THAT ON MAY-3-2007 CERTIFY
I SERVED A COPY OF A LETTER TO THE CLERK: MS. MARY E. D'ANDREA - SWORN DECLARATION - MEMORANDUM
OF LAW - DECLARATION IN SUPPORT OF MOTION - AND ORDER TO SHOW CAUSE, TO THE UNITED STATES
DISTRICT COURT, AND THE ATTORNEY GENERAL'S OFFICE, BY CAUSING THE COPY MAILED TO THE UNITED STATES
DISTRICT COURT TO BE DEPOSITED IN THE UNITED STATES MAIL CERTIFIED MAIL - RESTRICTED DELIVERY
AND TO ATTORNEY GENERAL'S OFFICE, MAILED FIRST CLASS POSTAGE PREPAID TO THE FOLLOWING:

HONORABLE: MS. MARY E D'ANDREA - CLERK

% UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF PENNSYLVANIA

235 NORTH WASHINGTON AVE.

P.O. BOX 1148

SCRANTON, PA. 18501-1148

OFFICE OF ATTORNEY GENERAL

15TH FL. STRAWBERRY SQUARE

HARRISBURG, PA. 17120

"RESPECTFULLY SUBMITTED"

S/ Henry Unseld Washington

AN-3086 PRO SE

HENRY UNSELD WASHINGTON

1100 PIKE ST.

HUNTINGDON, PA. 16854-1112

DATED:

HENRY UNSELD WASHINGTON
AM 3086
1100 PIKE ST.
HUNTINGD. DC

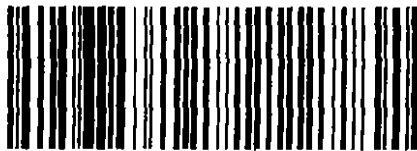
16654-1112

RECEIVED
SCRANTON

MAY 14 2007

PER [Signature] DESIGNEY

7006 0100 0004 3040 4760



CERTIFIED MAILTM

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

7006 0100 0004 3040 4760

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA
235 NORTH WASHINGTON AVE.
P.O. BOX 1148
SCRANTON, PA. 18501-1148
MAY 11 2007

INMATE MAIL
DEPT OF CORRECTIONS

UNITED STATES
PC



INMATE MAIL